

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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DR. RICHARD CARRIER,

Plaintiff,

vs.

Case No. 22:16-CV-00906

FREETHOUGHTBLOGS NETWORK,
PAUL Z. MYERS, PH.D., THE ORBIT,
STEPHANIE ZVAN, SKEPTICON, INC.,
LAUREN LANE, AND AMY FRANK SKIBA,

Defendants.

* * *

Deposition of DR. RICHARD CARRIER,
Plaintiff herein, called by the Defendants for
direct examination pursuant to the Rules of Civil
Procedure, taken before me, Wqueana N. George, a
Notary Public in and for the State of Ohio, at the
offices of Campbell, Perry, LLC, 7240 Muirfield
Drive, Suite 120, Dublin, Ohio, on Tuesday, January
23, 2018, at 10:50 o'clock a.m.

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1 APPEARANCES:

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1 DR. RICHARD CARRIER

2 of lawful age, Plaintiff herein, having been first
3 duly cautioned and sworn, as hereinafter certified,
4 was examined and said as follows:

5 DIRECT EXAMINATION

6 BY MR. RANDAZZA:

7 Q All right. Dr. Carrier, I'm going to ask
8 you a few preliminary questions that might seem a
9 little weird, but there is a reason for it.

10 A Okay.

11 Q He can hand signal to you if I'm full of
12 bologna.

13 A All right.

14 Q Have you ever had your deposition taken
15 before?

16 A No.

17 Q Have you ever seen it done on TV?

18 A Done on TV, no. The only thing close to
19 that is I saw a training video on it.

20 Q So, it's an interrogation, but there won't
21 be any extreme conditions or any torture or
22 anything. You just have to answer under penalty of
23 perjury. Do you know what that means?

24 A Yes.

25 Q What does it mean to you?

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1 A That it's a crime to say a falsehood in
2 this proceeding.

3 Q Okay. So we don't expect that's going to
4 happen?

5 A Correct.

6 Q There is a line though that you can wind
7 up at and I want to make sure that we stay away from
8 it and we all understand what it is. If you don't
9 know, tell me that you don't know. There may be
10 some situations here where I ask you to give me an
11 estimate, you know, so if I asked you to guess how
12 big this table is, you probably wouldn't be able to
13 do that, but you can estimate it. If we come into a
14 situation like that, let's make sure it's clear what
15 you're doing.

16 A All right.

17 Q Is there any reason you can't give a good
18 deposition today? For example, did you take LSD
19 last night?

20 A No.

21 Q Under the influence of any drugs or
22 medication?

23 A No.

24 Q The reason I'm asking you that is
25 obviously if we have a perjury situation later and

1 you say I had taken ten Vicodin that morning, you
2 know, I didn't know what I was saying. So is there
3 any reason -- you got a good sleep last night?

4 A Yes.

5 Q Had a healthy breakfast?

6 A Yes.

7 Q So you are doing better than me then. All
8 right. Why don't we get into it? So tell me about
9 your education. Let's start with that.

10 A I got my bachelor of arts at UC Berkeley
11 in history with a minor in classical civilizations.
12 I went on to get several graduate degrees at
13 Columbia University, a master of arts, a master of
14 philosophy and a Ph.D. in ancient history
15 specializing in ancient intellectual history.

16 Q What does that mean?

17 A It means a history of Greco-Roman
18 particularly Roman philosophy, religion, science and
19 related fields like technology. I have also
20 received training that gave me college credits in
21 the military.

22 Q What branch of the military were you in?

23 A United States Coast Guard.

24 Q How long?

25 A Two years.

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1 **Q What was your discharge status?**

2 A Honorable.

3 **Q Did they call it an MOS?**

4 A They are called rates, but yeah, the
5 equivalent of a MOS. I was a sonar technician. I
6 left service as an E-4, officer third class.

7 **Q That was before or after college?**

8 A That was before college.

9 **Q Where were you stationed?**

10 A Well, various places. Boot camp in Cape
11 May, New Jersey. I stayed at Cape May for awhile
12 working in intelligence doing security clearances
13 and then I went to San Diego for my training.
14 That's where I received twelve college units of
15 electronics engineering amongst other military
16 training and sonar and torpedoes and related
17 technologies and then I served a year at sea on the
18 Sherman, which is a cutter that is ported out of
19 Coast Guard Island in the Bay area of California,
20 but our tours took us all around the Pacific.

21 **Q Tell me about your Ph.D. program.**

22 A Can you be more specific?

23 **Q Sure. What was your thesis?**

24 A It was Attitudes Towards the Phyikos, P H
25 Y I K O S, which means natural philosopher in the

1 early Roman Empire 100 BC to 315 AD. That was the
2 title of my dissertation.

3 **Q Did it get published?**

4 A Yeah, I published it in the form of two
5 books, both in academic and general market.

6 **Q How well did it do?**

7 A It's too early to tell. For an obscure
8 academic monograph with footnotes and whatnot, my
9 books do surprisingly well for those kind of things.

10 **Q But not quite as lonely as the law review**
11 **publications?**

12 A I wouldn't know actually.

13 **Q Quite lonely writing. When people say**
14 **they've read your law review article, I think they**
15 **are usually lying. So after you finished your Ph.D.**
16 **program, what did you do after that?**

17 A So that was 2008. The economy collapsed,
18 so there was a freeze on hires in humanities
19 departments and I couldn't get a position. I had
20 also soured on the whole idea of becoming a
21 professor, so I went to my fans at the time, my
22 readers and fans and asked them to get together a
23 post-op research grant and they decided basically to
24 fund research. I said any subject they wanted and
25 they said the historicity of Jesus.

1 **Q Historicity?**

2 A Yes, whether he existed or not. So I did
3 a six-year project on that resulting in multiple
4 books and journal articles.

5 **Q What's your conclusion?**

6 A A one in three chance.

7 **Q That he existed at all?**

8 A Right.

9 **Q Let's talk about your relationship with**
10 **some of the plaintiffs (sic) here. Actually, let's**
11 **talk about Skepticon first. You spoke at Skepticon**
12 **1?**

13 A Yes.

14 **Q And who are the other speakers?**

15 A Skepticon 1 I believe was only PZ Myers
16 and myself.

17 **Q Do you remember what your talk was on?**

18 A My first talk -- I have done so many talks
19 for Skepticon now. I don't remember the order of
20 them. Wikipedia has an article so does YouTube.

21 **Q You said you soured on academia. Can you**
22 **tell me what that means?**

23 A I didn't like the entry departmental
24 politics and I didn't like all the work they give
25 you apart from just research and teaching. If it

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1 was just research and teaching and you didn't have
2 all the back stabbing and other whatnot that goes on
3 behind the scenes, it would be the pleasant romantic
4 occupation that I thought going in, but by the time
5 I finished my Ph.D. I saw what the job was really
6 like and I would rather be a self-employed writer as
7 I am.

8 **Q At Skepticon 1, is that where you met**
9 **Lauren Lane?**

10 A I think so, but I'm not sure. Certainly
11 by then.

12 **Q Okay. If not then do you recall meeting**
13 **her before that?**

14 A No, I don't. It was so many years ago.

15 **Q What is your relationship with her like?**

16 A Very friendly and flirtatious. We got
17 along well.

18 **Q Anything beyond flirtation?**

19 A Over the years, yes.

20 **Q Can you be more specific?**

21 A Let's see. Can you ask more specific
22 questions?

23 **Q Did you ever have sex with her?**

24 A Eventually, yes. That would have been
25 2012, the Skepticon of that year.

1 **Q You met her in 2008 and closed the deal as**
2 **it were in 2012?**

3 A It was more the other way around. In 2011
4 she is the one who asked to close the deal. I held
5 off. Eventually she essentially just stripped and
6 jumped into my bed in 2012 unasked.

7 **Q What did you do?**

8 A I participated enthusiastically at the
9 time. It wasn't me pursuing her.

10 **Q Do you believe that's her perception as**
11 **well?**

12 A I have no idea at this point.

13 **Q Aside from Skepticon 1, had you met Myers**
14 **before that?**

15 A I think so, but again we are talking
16 seven -- well, almost ten years ago. Gosh. Yeah.
17 Wow. I don't remember when I first met Myers.

18 **Q What about Stephanie Zvan, how do you know**
19 **her?**

20 A I knew her originally as a fellow blogger
21 at Freethought Blogs before she moved to the Orbit.
22 I met her I think at a Skepticon. I'm not sure what
23 year. I knew her as a blogger and I may have
24 communicated with her on occasion as well. I don't
25 recall exactly. For many years in any case.

1 **Q Do you remember where the venue was at**
2 **Skepticon 1?**

3 A No, I don't remember the name of the
4 place.

5 **Q Do you remember if it was at a university**
6 **or Knights of Columbus Hall?**

7 A That I don't recall. It was in
8 Springfield, Missouri.

9 **Q How many Skepticons have you spoken at?**

10 A I think six. I'm not sure. At least six.

11 **Q Do you remember the locations of any of**
12 **them?**

13 A I don't remember the exact venues. They
14 change from year to year. Some are private venues.
15 Some are hotel venues. I don't remember off the top
16 of my head. I write them down so I can check my
17 notes.

18 **Q Do you have notes on that?**

19 A Not here.

20 **Q But you do have notes on that?**

21 A Yeah, somewhere.

22 **Q What else do you put in those notes?**

23 A I'm just referring to regular
24 documentation that I have of where I have stayed and
25 things like that. I don't have a specific list of

1 where all the Skepticons have been. I have
2 documents throughout my career of various things.
3 If I go through them I can probably find out the
4 venues.

5 Q It's not like a journal that you keep?

6 A No. And frankly I'd probably Google it.

7 Q To find out where they were?

8 A Yes.

9 Q Who sponsors them?

10 A You mean who pays for them?

11 Q Um-hmm.

12 A That I don't know. A variety of donors.
13 They run fundraisers.

14 Q They are not academically sponsored?

15 A No, not to my knowledge.

16 Q Do you know where each of the defendants
17 reside?

18 A I think I do now. Yeah.

19 Q Do you call him PZ or Paul Myers?

20 A PZ.

21 Q Do you know where he lives?

22 A Minnesota.

23 Q You didn't know that before this?

24 A I think I did, yes.

25 Q Stephanie Zvan, did you know where she was

1 **before this case?**

2 A No, but it turns out to be Minnesota.

3 **Q How about Lauren Lane?**

4 A I was never sure. I just assumed
5 Missouri, various places.

6 **Q What about Amy Frank-Skiba?**

7 A That I assumed was Arizona somewhere.

8 **Q What made you assume it was Arizona?**

9 A Because that's where I met her and she was
10 going to school there at the time.

11 **Q And the same with Lauren Lane in Missouri?**

12 A Yes. For example, there was one year, I
13 can't remember which year, where I visited her and I
14 think I saw one of the places that she lived. She
15 moves around, so I'm not sure where she lives now or
16 has lived in the past prior to that and that was I
17 think in St. Louis.

18 **Q You've had sexual relations with Lauren**
19 **Lane?**

20 A Yes.

21 **Q What about Amy?**

22 A No.

23 **Q Myers?**

24 A No.

25 **Q So none of the other defendants in this**

1 **case just Lauren Lane?**

2 A Correct. I have not had sex with any of
3 the other defendants in this case.

4 Q **And by sex we are not using the Clintonian**
5 **definition?**

6 A Gotcha. Right. Yeah. No sexual --

7 Q **Handies count.**

8 A Right. No.

9 Q **Handies are better.**

10 A Right.

11 Q **I don't know how else to put that. I've**
12 **had more weird questions in depositions, but thank**
13 **you for your dignity in your response. You taught a**
14 **number of courses, online courses?**

15 A I do teach online courses.

16 Q **Do they ever have in-person meetings?**

17 A No.

18 Q **Let's go back to your relationship with**
19 **Lane. You said she hopped into bed with you at?**

20 A Skepticon 2012.

21 Q **And does Skepticon -- and I'm not trying**
22 **to trip you up. I don't remember. Does Skepticon**
23 **have a code of conduct prohibiting that kind of**
24 **relationship?**

25 A Not prohibiting that kind of a

1 relationship, no.

2 Q What is your understanding about their
3 policies?

4 A Policy may have changed over the years,
5 but in 2012 the policy did allow consensual sexual
6 relations.

7 Q Between any attendees?

8 A Yes, as far as I can recall.

9 Q You don't know if it has changed yet?

10 A Correct. I don't know what their policy
11 is now.

12 Q When is the last time that you spoke at a
13 Skepticon?

14 A It would have been 2013.

15 Q Have you attended them since then?

16 A I attended the one in 2015, yes.

17 Q So when you -- you had relations with
18 Lane, was it just the one time?

19 A No.

20 Q How many times, if you can recall? I
21 don't mean how many times you engaged in coitus.
22 How many meetings?

23 A At least two different occasions at that
24 Skepticon and one or two times at a subsequent
25 conference in Austin, Texas.

1 **Q Do you know when the last time was?**

2 A The Austin conference.

3 **Q What year was that?**

4 A That was -- it would have been early 2013.

5 **Q Why did this relationship break off?**

6 A Well, at the time I was having this
7 relationship with her I was cheating on my wife and
8 started to have anxiety over that and wasn't sure
9 about what I should be doing with my life in terms
10 of should I just admit that I can't be monogamous or
11 should I stop this relationship. I basically told
12 her I'm freaking out over our relationship. I want
13 to cool it off and think about things for awhile and
14 I didn't want to see her anymore, and then she kept
15 trying to opportune me to reignite the relationship
16 to the point I had to basically cut off all
17 communication with her.

18 **Q You are openly vocal about being a**
19 **swinger, yes?**

20 A Yeah, I'm poly amorous ethically
21 nonmonogamous. That started after. It's that
22 incident that led me to start thinking about what I
23 should be doing with my life, so eventually I
24 confessed to my wife that I didn't want to do
25 monogamy anymore and I understood if she wanted to

1 get a divorce and she decided to try an open
2 marriage for a little while and we did. Eventually
3 we divorced amicably because that wasn't her
4 lifestyle either, but it was the lifestyle that I
5 wanted, but that happened in the midst of 2013.

6 Q That was Skepticon 6?

7 A I don't remember what the number is.

8 Q Did you have sex with anybody else at that
9 Skepticon?

10 A Yes.

11 Q Who was that?

12 A I had sex -- do we want to have her name
13 on the record?

14 MR. RANDAZZA: Let's go off the record.

15 (Thereupon, an off-the-record discussion
16 was had.)

17 BY MR. RANDAZZA:

18 Q Off the record we had a discussion about
19 the name of somebody that the deponent had sex with.
20 In order to not likely violate her privacy, we've
21 agreed that we will not use her name without further
22 discussion. Should that become necessary, we will,
23 but for now we will refer to her as Ms. B. We all
24 understand who Ms. B. is?

25 A Yes, we do.

1 **Q Okay. Has Ms. B. ever revisited you?**

2 A Yeah, we continued friendly flirtatious
3 relationship for years after.

4 **Q No further sexual relations?**

5 A No.

6 **Q Did she ever, to the best of your**
7 **knowledge, complain about any of your conduct with**
8 **each other?**

9 A No, not at all.

10 **Q So where did you live when all of this**
11 **took place?**

12 A California.

13 **Q Where in California?**

14 A That would have been various places. What
15 years exactly are you talking about?

16 **Q What was your last residence in**
17 **California?**

18 A Stockton, California.

19 **Q And when did you leave Stockton,**
20 **California?**

21 A When I moved to Ohio.

22 **Q Do you have a date?**

23 A It was in May that I moved.

24 **Q May of what year?**

25 A 2016.

1 **Q Why did you pick Columbus?**

2 A A variety of reasons. Primary of which is
3 that I could no longer afford to live in California.
4 To be an independent artist like myself you need to
5 keep your overhead really low, but I can work from
6 anywhere. I was trying to pick a place I can go
7 where the living expenses were low enough that I
8 could survive and do well with my business and I had
9 more girlfriends in or near Ohio and Ohio was well
10 positioned for -- there's a lot more major cities I
11 can get to from Ohio by driving with a much bigger
12 demand for my work.

13 **Q Don't you make more money in California?**

14 A Not now.

15 **Q I'm saying like the cost of living and --**

16 A Yeah, no --

17 **Q For example, a lawyer out here --**

18 A The cost of living out pays income in
19 California. Whereas I make better income on the
20 east coast or on the east side of the country with
21 much lower living expenses. The difference is
22 better. It's much more survivable there.

23 **Q So maybe your line of work is different**
24 **from mine. I know when I have a case, for example,**
25 **in California and we can seek attorney's fees, the**

1 judges don't even look at us funny when we ask for
2 7- or \$800 an hour. If I tried to do that in a
3 place like Wyoming, they would probably look at me
4 and say around here we charge \$150 an hour. Is that
5 kind of the differential knot existent in your line
6 of work?

7 A Not really, no. It doesn't work that way.

8 Q So you make the same no matter where you
9 work?

10 A Pretty much, yes.

11 Q Now it's coming into focus for me. Your
12 income is fixed?

13 A Fixed is the wrong word.

14 Q What is the right word?

15 A It's highly variable, but it does not
16 respond to geography. Other than in terms of
17 demand, which is actually higher in more religious
18 states than in lower religious states like
19 California.

20 Q Why is that?

21 A I have been speculating on this so I
22 really don't know for sure, but based on
23 conversations that I've had with people all over
24 North America, organizations and groups in states
25 that are beleaguered by religious oppression are

1 much more excited and interested in hearing the kind
2 of work that I do and they are more excited about
3 meeting me and they are more likely to hire me. In
4 California there's a lot more -- it's more secular
5 there, so people are more apathetic and less
6 interested, so turn out is not as good in California
7 events as it is in other states.

8 **Q Not much use for you in Boston?**

9 A I haven't tried Boston yet. But Boston is
10 surrounded by problematic areas in that regard, so
11 people will come to Boston possibly.

12 **Q What do you mean a problematic area?**

13 A Well, in terms of there's a lot of rural
14 religious communities in that state and that state
15 is small enough for people to get to Boston. I
16 haven't tried, so I don't know.

17 **Q How is Mississippi, is that like happy**
18 **hunting ground for you?**

19 A It would be. I haven't tried it yet. I
20 have done other southern states.

21 **Q Florida?**

22 A Florida, good turnouts there. Arkansas,
23 Alabama.

24 **Q I know this is probably a difficult --**

25 A Oh, I meant Tennessee not Arkansas.

1 Q I understand what I'm about to ask is
2 probably going to be difficult for you to understand
3 and explain with perfect accuracy without your notes
4 and your planner before you, but this is where we
5 get into the estimate and not guess --

6 A Before we do that, can we take a brief
7 break so I can get some water?

8 MR. PERRY: Sure. Absolutely.

9 (Thereupon, an off-the-record discussion
10 was had.)

11 BY MR. RANDAZZA:

12 Q So you allege in your complaint and I will
13 read from the complaint, through and the result of
14 his accomplishments in a career spanning more than a
15 decade Dr. Carrier has become well-known to the
16 public throughout the United States as a
17 professional writer, lecturer and teacher. He has
18 created a unique public personality and image. Do
19 you stand by that statement?

20 A Yes.

21 Q So I guess I would ask, how famous are
22 you?

23 A Well, let's see. I'm trying to think of
24 ways to measure it.

25 MR. PERRY: Don't guess.

1 THE WITNESS: Can you be more specific.

2 How would I measure it?

3 BY MR. RANDAZZA:

4 Q Let's put it this way, let's role play.

5 You are hitting on a girl at a conference and she

6 hasn't heard of you. Now, Ron Burgundy would say

7 I'm kind of a big deal and I have many leather bound

8 books. Pretend you find me attractive and you are

9 trying to swoon me with how famous you are.

10 A That would be a terrible way to do it. I

11 don't understand the question. Can you be more

12 specific to what your question is?

13 MR. RANDAZZA: I will throw the card on

14 the table. Do we agree that he is a public figure?

15 MR. PERRY: I think so. We've alleged

16 that in our complaint. In other words, we will

17 stipulate.

18 BY MR. RANDAZZA:

19 Q So then I don't need to walk you through

20 that.

21 A For sure.

22 Q So before you took your break you were

23 talking about different geographic areas where you

24 find your services are most in demand. We talked

25 about some areas that you haven't tried speaking at

1 yet. What I want to do is create a mental map here
2 of where we would stick some thumb tacks of where
3 you have spoken. What is your most popular state?

4 A I couldn't say now. The best benchmark
5 that I have before your clients' defamation altered
6 the nature of my business, which would be 2015 -- I
7 have good records for that. In that year I made
8 more money in Ohio than in any other state except
9 California because I was living in California, so it
10 was easier to develop business in California. I
11 made -- well, yeah, that's -- all the other states
12 substantially less state by state.

13 Q How about Florida?

14 A I don't remember the precise amounts. We
15 have supplied you with documents that have those
16 numbers though.

17 Q You provided us with some federal income
18 tax?

19 A And spreadsheets concerning my speaking
20 and direct sales business, which was the most
21 impacted by your clients' claims.

22 Q Who made those spreadsheets?

23 A I did.

24 Q And what about for like the three years
25 prior to this, so do you --

1 A Prior to which year?

2 **Q The three years prior to my clients'**
3 **alleged defamation, were you often commuting from**
4 **California to Ohio?**

5 A No, I started developing my Ohio business
6 in 2015. I had spoken in Ohio in previous years.
7 That was so many years ago. Without consulting
8 notes I don't know where and when. Before 2014 I
9 was only conducting my business part time. I was
10 actually a full-time homemaker. Basically I was
11 taking care of my wife in terms of the domestic
12 business and she was bringing home the income. It
13 was like Ozzie and Harriet, gender reverse. I would
14 cook dinner for her when she got home. I made sure
15 she had no duties at the house. I did all the
16 cleaning and laundry and all of that stuff. Taking
17 care of the pets and taking them to the vet and all
18 of those things. Therefore, I was only part-timing
19 my business at that point. I only full-timed my
20 business in the beginning of 2015 once I separated.

21 **Q I want to make sure that you didn't make a**
22 **mistake when you said you moved to Ohio in June of**
23 **2016.**

24 A May of 2016.

25 **Q We have prior statements from you saying**

1 **June. I realize those two things --**

2 A Well --

3 **Q I don't think you are committing perjury.**

4 A I took residence on May 31, but I had
5 already signed a lease a month or two before that.
6 Actually, I think in our subsequent fulfilling of
7 discovery requests there is more on that, but
8 records and things like that would be delivered to
9 you eventually. It definitely was in May and that's
10 actually quite public knowledge. It's all over the
11 Internet.

12 **Q Did you file Ohio State income taxes in**
13 **2016?**

14 A Did I file in 2016? I did -- no, I did
15 not because my income in Ohio -- actually, my income
16 federally was zero owing to legal expenses fighting
17 this case.

18 **Q In 2016?**

19 A Correct. You are talking about the tax
20 year 2016?

21 **Q Yes.**

22 A Which would have been paid in 2017, right?

23 **Q Yes. What was your tax domicile for the**
24 **year 2016?**

25 A When I filed taxes in 2017 I did split

1 California and Ohio. I didn't have to file in
2 either state because my income was zero.

3 Q So you are deducting your legal expenses
4 as a business expense?

5 A Correct. That is shown in the documents
6 that we have sent you.

7 Q Now, don't tell me what this person said.
8 I will ask you a question that could implicate
9 attorney/client privilege. Sometimes a person will
10 utter out the answer and then the attorney says oh,
11 wait. Objection. I like to say hey, I'm about to
12 ask something that might get near it and if it does
13 I want him ready to object. Did you consult anyone
14 prior to claiming your legal expenses as a business
15 expense?

16 MR. PERRY: I will object to form.

17 BY MR. RANDAZZA:

18 Q Did you consult an attorney?

19 THE WITNESS: May I answer the question?

20 MR. RANDAZZA: I don't want to know what
21 the attorney said.

22 MR. PERRY: I will object to form.

23 THE WITNESS: It's a statement of fact.

24 Do you want me to answer?

25 MR. PERRY: You can answer, yes.

1 THE WITNESS: No.

2 BY MR. RANDAZZA:

3 Q Did you consult with a CPA?

4 A No.

5 Q So on what basis did you form the opinion
6 that those were deductible business expenses?

7 A I have always been my own accountant and I
8 read the IRS documents carefully and defamation of
9 my business falls under the allowable deductions for
10 that year.

11 Q Did you have any income that you did not
12 report in 2016, 2017?

13 A No.

14 Q Do you receive alimony from your ex?

15 A No.

16 Q Did you ever?

17 A No.

18 Q Did you seek it?

19 A No.

20 Q If we can go back, there was an answer
21 before, you said it was widely known that you moved
22 to Ohio. That's of course at issue in this
23 deposition. You remember I asked you describe how
24 you are famous. That was a difficult thing to nail
25 down really. Would it be equally difficult to nail

1 **down why it's common knowledge that you moved to**
2 **Ohio?**

3 A Can you ask the question more
4 specifically?

5 Q **You said widely known. Can you define**
6 **widely known?**

7 A Yes. So I blogged about it multiple times
8 on my blog. My blog has a readership in the
9 community -- in the vicinity of a hundred thousand
10 and I also announced it on Facebook, which has
11 somewhere between 5- and 10,000 readers also
12 associated with the community and Twitter. I'm not
13 sure what my Twitter audience is, but it is growing.
14 It's also in the thousands. Within the secular
15 community that hits a lot of people.

16 Q **So your blog, do you have like an**
17 **analytics of readership on that blog?**

18 A Yes. Of course back at the time I would
19 have been using Freethought Blogs analytics. They
20 deleted all of those records. I don't have access
21 to them anymore. I do know from what I had been
22 reading at the time looking at the analytics that my
23 readership was in the vicinity of a hundred
24 thousand.

25 Q **Did it track IP addresses?**

1 A It may have. I never looked at that.

2 **Q So your independent blog now, when did you**
3 **start writing on that instead?**

4 A When Freethought Blogs blocked access to
5 my blog and made it clear that there was not going
6 to be a fair investigation for me to get it back. I
7 was forced essentially to relaunch my blog
8 elsewhere. That was difficult rebuilding the blog
9 business because all of the IP addresses, all of the
10 Google search results and everything were pointing
11 to Freethought Blogs. It took a whole year to
12 rebuild the ability for people to find my new blog
13 location. Analytics on that is all problematic
14 because of that. Now I'm back up to about the same
15 readership.

16 **Q You do your own analytics now?**

17 A Yes.

18 **Q Can you tell me about how they work? Is**
19 **it like a Google analytics? Is it a dashboard?**
20 **What platform is it on?**

21 A It's through WordPress Jetpack. It
22 provides those kind of data.

23 **Q I'm slightly familiar with it. Probably**
24 **not enough to ask you the most intelligent questions**
25 **here. Do you know if it tracks IP addresses?**

1 A If it tracks every IP address that hits my
2 website; is that what you're asking?

3 **Q Yes.**

4 A I don't know. I haven't checked that.

5 **Q You couldn't tell me if you knew the IP**
6 **address that I was logged onto right now if I read**
7 **your blog, you wouldn't be able to tell it had been**
8 **me?**

9 A Not sitting here right now.

10 **Q Have you ever tried to track a single**
11 **person reading your blog?**

12 A A single person?

13 **Q Or a single IP address?**

14 A The only time that I recall doing that is
15 when I have had attempted to hack my site and I
16 would research where the IP address is and then
17 block it if it looks suspicious. That is the only
18 occasion that I can think of. Definitely not on
19 every occasion have I done things like that.

20 **Q So you can drill down to the individual IP**
21 **address?**

22 A Those are for attempts to hack the site.
23 That's a security function. That's a different
24 location. I haven't checked to see if I can dig in
25 to look at everyone that comes to my site. I might

1 have that availability. I don't know.

2 Q I want to know if this would be possible,
3 you meet a hot girl from Anchorage, she goes home,
4 you tell her what a big deal you are, you go back
5 and look at the analytics, can you tell if someone
6 from Anchorage looked at your site?

7 A I don't know.

8 Q You never used it that way?

9 A No.

10 Q Do you like my idea?

11 A No.

12 Q Why not?

13 A That's kind of invasive. I don't approach
14 people by spying on them. That's not a device I
15 would use.

16 Q You would consider it spying on them to
17 see if a certain city --

18 A Yeah, looking at the site to -- other than
19 just asking them hey, did you look at my website?

20 Q Ethically, it's something that even if you
21 could do it, you wouldn't do it because it violates
22 your ethics?

23 A I would need a valid reason. There may be
24 ethical reasons to do it, but it's not something
25 that would occur to me to do. It seems a little

1 weird.

2 Q Someone says I read your site every day
3 and you know they are from Billings, Montana, you
4 suspect they might be lying to you, you wouldn't
5 look into that?

6 A I wouldn't even do that. Possibly you can
7 construct a scenario where I might think it would be
8 valid to do that, but that's something that I have
9 never done or would think of doing.

10 Q Have you looked at it to see which states
11 might be where your largest readership is coming
12 from?

13 A No, I haven't looked into that data. I'm
14 not sure it does the math on that. It doesn't
15 matter since my current blog is the one that I
16 created after the defamatory statements. I don't
17 have access to the data for the blog that I was
18 using when I was announcing my move.

19 Q As far as today, you don't know where your
20 strongest readership comes from?

21 A Not sitting here, no.

22 Q You haven't researched that since leaving
23 Freethought Blogs network?

24 A No.

25 Q It's safe to say even you don't know where

1 **your largest readership comes from?**

2 A On my blog presently, no.

3 **Q Does Facebook have the ability to analyze**
4 **that data?**

5 A Not that I'm aware of.

6 **Q Does Twitter?**

7 A Not that I'm aware of.

8 **Q Neither sitting here today nor at any**
9 **point would you be able to tell me where at least**
10 **your strongest publication market is?**

11 A I don't know.

12 **Q In June of 2016 Amy Skiba posted an**
13 **article or blog post, whatever you want to call it,**
14 **posted statements that you considered to be**
15 **defamatory?**

16 A Yes.

17 **Q Accusing you of sexually harassing her and**
18 **touching her?**

19 A Yes.

20 **Q What is your response to that factually?**

21 A I did neither of those things.

22 **Q You've never touched her?**

23 A No. I was actually quite paranoid about
24 touching people without their permission back then
25 and even more so now.

1 Q So it's your position that she has made
2 all of this out of thin air?

3 A Yes, she is definitely lying.

4 Q It wasn't like maybe it was consensual,
5 maybe it wasn't, this is it never happened, black
6 and white?

7 A Correct.

8 Q Did you have any arguments with her before
9 that?

10 A No.

11 Q Have you ever had a dispute with her?

12 A No.

13 Q Can you imagine why she would make that
14 up?

15 A I'm completely bewildered.

16 Q Have you ever rejected her advances?

17 A No.

18 Q She's never made advances towards you?

19 A No, not in clear terms anyway.

20 Q I don't know if that's funny or just
21 confusing.

22 A You need to ask a different kind of
23 question.

24 Q I guess, she's never openly flirted with
25 you that you could tell?

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1 A No. She has not indicated that she is
2 interested in dating me, if that's what you mean.

3 Q I'm not a hundred percent clear on some of
4 your sexual activities. I don't disapprove. Who am
5 I to disapprove? But I don't understand. Is dating
6 the only verb we should be using here?

7 A I don't know how to answer that question.

8 Q Dating and fucking are two different
9 things, right?

10 A I would definitely put fucking under a
11 subcategory of dating.

12 Q So when we say dating we are also talking
13 --

14 A Yes, in the Venn diagram dating and then
15 fucking is entirely inside the dating margin.

16 Q It's great deposing you. That's
17 exactly -- yes, it makes it very easy when we are
18 clear. If only you can give lessons to women I want
19 to date. Here is the Venn diagram. I might hire
20 you after this to come hang out at my date for like
21 the first ten minutes. It wouldn't be a conflict
22 after this is over, right? Tell me about some of
23 your other income sources. You have speaking
24 engagements?

25 A Um-hmm -- yes.

1 **Q Camp Quest, what is Camp Quest?**

2 A Camp Quest, the national organization of
3 Camp Quest is a support organization that licenses
4 and supports basically summer camps for nonreligious
5 people. It's basically like Christian summer camp
6 except for seculars. They have camps in multiple
7 states. The national organization basically
8 supports all of them.

9 **Q Do they have any in Florida?**

10 A They might now. I'm not sure.

11 **Q Which of their camps have you visited?**

12 A The only camp I visited was Camp Quest
13 West in California and that was 2005, plus or minus
14 a year or two.

15 **Q The only Camp Quest you've been to is this**
16 **one in 2005?**

17 A Yeah, somewhere around that date or year.

18 **Q What city in California is that in?**

19 A North of Sacramento is where the camp site
20 is. I don't remember the exact location.

21 **Q That's precise enough for me. Do you know**
22 **the locations of any other Camp Quests in**
23 **California?**

24 A Yes. They just opened a new one on
25 Catalina Island. I don't remember when they opened

1 it, but there's on in California in the mountains.

2 Q There is only three in California?

3 A As far as I know.

4 Q Do you know of any others?

5 A They opened several in the south. I know
6 there is one in Ohio. Normally this is a question
7 where I would go to the website and look at the
8 list. I know there are many other states.

9 Q You only know of one in Ohio?

10 A Yes.

11 Q Do you know where it is?

12 A No.

13 Q I don't mean precisely. With precision of
14 the one you told me in California, is it outside of
15 Steubenville?

16 A I never looked at the actual location of
17 it.

18 Q You said that when Freethought Blogs
19 suspended you, you were under the impression that
20 you wouldn't get a fair investigation?

21 A Yes.

22 Q Why did they suspend you?

23 A Because of the statements made by the
24 other defendants.

25 Q And what specifically do you understand to

1 **be the statements made that got you suspended?**

2 A The ones we've included in our complaint.

3 **Q Can you give me the general genre of them?**

4 A Yes, Amy Frank's accusations that we
5 discussed earlier in this deposition. Stephanie
6 Zvan also wrote some things around the same time
7 they decided to suspend me at Freethought Blogs and
8 Skepticon. Those happened on the same day.
9 Skepticon's publication of accusations of sexual
10 harassment were also false.

11 **Q How much did Freethought Blogs pay you?**

12 A I chose not to be paid by Freethought
13 Blogs, so I could have ad free content. I was
14 looking to develop patron support instead.

15 **Q You said you were also suspended from**
16 **Skepticon?**

17 A Yes, they issued a ban not allowing me to
18 attend or speak.

19 **Q You couldn't even attend?**

20 A That was my understanding, yes.

21 **Q How much did Skepticon pay you?**

22 A I worked Skepticon for free, but I earned
23 upwards of between 500 and \$1,000 per event on book
24 sales and the promotional value of speaking at
25 Skepticon is huge.

1 Q But Skepticon never paid you?

2 A No, Skepticon takes its speakers without
3 pay.

4 Q So there is a statement that Ms. Zvan made
5 where she is talking about this after party at a pub
6 where she was quoting you, do you recall this?

7 A Yes.

8 Q She said at an after party at a pub after
9 a sponsored event that had an event policy against
10 making sexual advances you misread someone's
11 fascination with the subject matter as flirtation?

12 A There are some errors in that statement.

13 Q But those are your words?

14 A Those are not my exact words.

15 MR. RANDAZZA: Can you pull that post?

16 THE WITNESS: Do you have my post?

17 BY MR. RANDAZZA:

18 Q Yes, I'll have her pull it up.

19 A It would be more helpful to read my post.

20 Q At some point you guys would want lunch.

21 What I will do is put a pin in that idea.

22 A Okay.

23 Q Is it true you didn't fight the Secular
24 Student Alliance Speakers Bureau?

25 A Yes.

1 **Q And why didn't you object to that?**

2 A Because that was their fraternization
3 policy that only applied to speakers bureau and not
4 to other speakers. So speakers could speak at SSA
5 events who were not on the bureau and it just made
6 more sense not to be on the bureau.

7 **Q And you also didn't object to being banned**
8 **from Freethought Blogs?**

9 A No, I did object to being banned from
10 Freethought Blogs and I tried to get control back,
11 but when Myers made it clear that I wasn't going to
12 get a fair process, I clearly had no way forward on
13 that.

14 **Q How did he make that clear?**

15 A In the phone conversation we had he
16 refused to tell me -- he insisted that I defend
17 myself so they could do their investigation before
18 releasing control of my blog. On the phone he told
19 me he would not tell me who was accusing me, what
20 they were accusing me of, where or when and I told
21 him I can't defend myself if you are not going to
22 give me that information and he said he didn't care.
23 He said you should just admit it and apologize. I
24 said but the claims are false. I told him if you
25 are not going to let me defend myself and if you're

1 going to do this, I will have to sue you to get you
2 to stop and he said go ahead.

3 Q Did they have, as far as you know, an
4 established policy for this?

5 A No.

6 Q You know they didn't have one or you
7 don't?

8 A I was unaware of any established policy
9 and I'm pretty sure they still don't have one.

10 Q So how would you describe sitting here
11 today that interaction?

12 A Which one?

13 Q The one we just talked about where it was
14 somebody seemed to have misunderstood. You seem to
15 have misunderstood someone's --

16 A You are talking about --

17 Q -- interest.

18 A It would be easier if we started that with
19 you reading my statements from the blog.

20 Q What do you recall about the incident
21 sitting here today? We can refresh your
22 recollection later. I'm looking for what you
23 remember now, if you have any detail on it.

24 A There were a number of inaccurate
25 statements in the statement that you read earlier,

1 so I don't want you to assume that I'm acknowledging
2 that those things are true.

3 Q We will not acknowledge that.

4 A Can you be more specific about what you
5 want to know about that incident?

6 Q First of all, do you remember the name of
7 the person?

8 A Only her first name.

9 Q What was her first name?

10 A Can we do that off the record too?

11 Q Is it an unusual name?

12 A Enough.

13 MR. RANDAZZA: Let's go off the record.

14 (Thereupon, an off-the-record discussion
15 was had.)

16 BY MR. RANDAZZA:

17 Q So during off the record discussion we
18 have identified a woman with whom there was some
19 interaction. Given the fact that her name is less
20 than very common, we will refer to her as Ms. F. We
21 have an agreement off the record of who this person
22 is?

23 A Yes.

24 Q So, when you spoke with Ms. F, can you
25 describe when you first spoke to her?

1 A When I first spoke to her was during the
2 event before I spoke and Q and A after and chatting
3 afterwards, that's when I first spoke to her.

4 **Q So tell me a bit more about your**
5 **interactions with her? What do you remember?**

6 A She was really fascinating, had a lot of
7 really interesting ideas in aesthetic theory and
8 literary analysis of the Star Wars trilogy and I was
9 really fascinated in that subject and various other
10 things she was talking about at the time and really
11 liked conversing with her. When we all sort of
12 informally retired to a pub afterwards we continued
13 talking for an hour or two hours I think with
14 various people present. In the midst of that at one
15 point I said I would like to ask you out and her
16 visible reaction to that suggested to me that she
17 didn't like that, so I apologized immediately and
18 didn't renew that during that conversation. That's
19 how that interaction went that I was writing about
20 that you are talking about.

21 **Q So there was no physical contact?**

22 A No.

23 **Q You mentioned earlier that you publicized**
24 **your move on Facebook, Twitter and your blog?**

25 A Yes.

1 **Q Do you have any evidence that any of the**
2 **defendants read about it on Facebook?**

3 A Whether they read about it on Facebook, I
4 do not know.

5 **Q So you have no evidence to prove that?**

6 A Not that they themselves read it on
7 Facebook except for Amy Frank, she actually almost
8 certainly did.

9 **Q What do you mean by almost certainly did?**

10 A Well, we know now from discovery documents
11 that she was regularly searching my name, Richard
12 Carrier, on Facebook. She was looking specifically
13 for speaking engagements and particularly speaking
14 engagements involving universities. Any search she
15 did of that nature would have resulted in her seeing
16 my announcements of moving.

17 **Q Why do you know it would have resulted in**
18 **that?**

19 A She even noticed really obscure
20 announcements that had nothing to do with speaking
21 events or university events. For example, the Camp
22 Quest announcement that even I didn't see on my wall
23 she saw on my wall, so if she has seen even events
24 like that, there's no possible way that she could
25 not have seen my announcements about moving across

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1 the country. They were even more prominent than
2 that one and it included one speaking engagement at
3 a university.

4 Q Would that be an estimate or a guess?

5 A I don't understand the question.

6 Q Well, you don't know for a fact that she
7 saw it, you find it probable?

8 A Well, we can get into the theory of
9 knowledge on this. But given the facts available to
10 me, the probability of her having read that is as
11 near to a hundred percent as makes all odds.

12 Q Back to my question. You have no evidence
13 that she read it?

14 A Other than the evidence that I just told
15 you about.

16 Q And that evidence is that she saw other
17 things on your Facebook wall?

18 A She reported she was regularly searching
19 my wall and searching using the name Richard Carrier
20 specifically searching for events where I was
21 speaking at a university and demonstrated that she
22 was also noticing even the most obscure things
23 announced on my wall.

24 Q In fact, she had read something on your
25 wall that you had not read?

1 A Correct.

2 Q So if you had not read an announcement on
3 your wall, is it not a bit of a logical fallacy to
4 say that somebody else must have read everything on
5 your wall?

6 A Not at all because I wasn't doing what she
7 was doing.

8 Q You weren't reading your own Facebook
9 wall?

10 A No, I wasn't searching someone's name on
11 their website specifically looking through every
12 single announcement to see where I might be speaking
13 and in the result of that demonstrating that they
14 are noticing every single thing on my wall including
15 that announcement.

16 Q Would the search turn up different results
17 if you searched for Richard Carrier in quotes or
18 without them?

19 A I don't know.

20 Q Have you searched Facebook that way one
21 way and then the other?

22 A No, not that I can recall.

23 Q How about on Google, have you ever done
24 that?

25 A Yeah.

1 **Q Self Googling?**

2 A I have used Google with quotes and without
3 quotes to see if there is a difference in effect on
4 other things, yeah.

5 **Q But not in searching your own name?**

6 A Not that I recall.

7 **Q Do you know the existence of any other**
8 **Richard Carrier's in the United States?**

9 A Yes. In fact, that may be something we
10 will include in the discovery materials. We already
11 included some for you that we sent to you. Once you
12 started making statements in your motions, I started
13 researching that and I discovered there's a Richard
14 Carrier Trucking in Maine. I was able to do a
15 comparison of how often people were searching for
16 that guy versus me and generated a lot of material
17 related to that, which will be submitted to you.

18 **Q How were you able to tell that they were**
19 **looking for him and not you?**

20 A Because you can look for how often the
21 search term Richard Carrier Trucking is being
22 searched versus just Richard Carrier and then
23 compare that with when you do search Richard Carrier
24 how many pages in the results you have to go before
25 you find Richard Carrier Trucking, because they are

1 ranked by how many people are looking at those
2 sites.

3 **Q What do you mean they are ranked by?**

4 A When you do a search on Google and Google
5 pages can explain this. This is public knowledge.
6 When you do a search on Google and you see the hits,
7 it will give you ten links per page if you keep
8 going page after page after page. We went ten pages
9 in and recorded everything on one search recently.
10 It ranks those by how many people are clicking
11 through those links. If you do a Richard Carrier
12 search the top link is the one that most people are
13 looking at. It assumes that's the one you want to
14 see and then it starts ranking them below that. The
15 further deeper into the number of pages means the
16 fewer people are clicking through the site.

17 **Q Is it the same if you use a Mac or a PC?**

18 A I don't think there's a difference.

19 **Q Did you do it from a Mac or a PC?**

20 A From a Mac.

21 **Q Whose Mac was it?**

22 A Mine.

23 **Q Do you remember which browser you used?**

24 A I'm assuming it would have been Firefox,
25 but I can't recall if I used different browsers on

1 different occasions.

2 Q Do you ever worry about people doing what
3 I suggested before as tracking your IP address if
4 you go to their website?

5 A I don't understand the question.

6 Q Remember before you said it would be
7 invasive of your reader's privacy to look at their
8 IP addresses?

9 A Unless you had an ethical reason to do
10 that, yeah.

11 Q By ethical you mean personal ethical
12 reasons? What code of ethics are we talking about?

13 A You need a valid reason. To just go
14 spying on someone I consider unethical, but if you
15 have a particular ethical reason that's driving you
16 that you actually need this information to pursue
17 something for a valid reason --

18 Q Do you worry that other people might do
19 that to you?

20 A How?

21 Q Well, just the way I described. Do you
22 worry about, you know, just as you are saying it
23 would be unethical of you to do that to a reader,
24 are you concerned that other people may not share
25 your high ethics?

1 A I know for a fact they don't, but I don't
2 worry about it because of the way I've organized my
3 life. I can't think of any way that would harm me,
4 but my life doesn't work the same way as everyone
5 else's.

6 Q **You don't take precautions to keep that**
7 **from happening?**

8 A I don't even know how to keep that from
9 happening.

10 Q **Do you know what a VPN is?**

11 A Yes, I do know about VPNs. Good point.

12 Q **Do you use them?**

13 A I've only used VPN one time when I visited
14 England. There was a reason I needed to do that
15 there. I don't use VPNs in any other occasions.

16 Q **What e-mail platform do you use?**

17 A Apple's innate iMail.

18 Q **So your e-mail address is -- what is after**
19 **the at?**

20 A I have a number of e-mail address. Which
21 one are you asking about?

22 Q **All of them.**

23 A All of my e-mail addresses all reflect
24 back to my iCloud account. Every single one of the
25 e-mail addresses direct e-mails to the same account,

1 which is Richard.Carrier@iCloud.com.

2 Q They are e-mail forwards, not separate
3 accounts?

4 A I'm not sure I understand the question.

5 Q Give me one of your other e-mail
6 addresses.

7 A For example, I don't remember the exact
8 address, but I have an iMail address with my
9 Columbus alumni association.

10 Q Columbus or Columbia?

11 A Columbia. Thank you. Columbia University
12 Alumni Association. That e-mail does collect
13 somewhere on the web independently like you can read
14 it as if it was an e-mail, but I never do. It's
15 connected to my iCloud account.

16 Q Do you have Gmail account?

17 A Yes, I do. Same thing.

18 Q Your Gmails get forwarded to Apple?

19 A Yes.

20 Q Do you use them for separate reasons?

21 A Sometimes -- I would rather just have my
22 RCarrier@infedels.org account, but that was retired
23 when I left secular web. It's now just a reflect or
24 it doesn't collect anywhere. I have to have an
25 iCloud.com account to use my Apple mail account.

1 The others are things that were given to me and are
2 out there, so I just have to keep monitoring them,
3 so I just have them all reflect to my main account.

4 **Q What calendaring system do you use?**

5 A Two different calendaring systems. Google
6 calendar and the innate Apple iOS calendar.

7 **Q They reflect to one another?**

8 A No, they aren't linked.

9 **Q Do you have two-factor authentication**
10 **enabled in your Google account?**

11 A Yes.

12 **Q Is it through your cell phone, they send**
13 **you a text message?**

14 A I have two-factor on so many things. I
15 don't remember which methods are available from
16 which ones. I don't recall right now.

17 **Q Is it that you don't log in and out of it**
18 **much?**

19 A I almost never use Google.

20 **Q Do you remember the last time that you**
21 **logged in?**

22 A No, I don't.

23 **Q Did you log out or did you just close the**
24 **browser?**

25 A I honestly don't remember.

1 Q You don't have your computer with you
2 today, do you?

3 A No.

4 Q So if we were to log into it, you might
5 still be logged into your Google account?

6 A It's theoretically possible, yes.

7 Q You don't recall logging out?

8 A I don't recall logging out.

9 Q How often do you delete all cookies on
10 your computer?

11 A I usually don't do that for any reason
12 unless it crashes, which has happened multiple times
13 since my computer is pretty old. Sometimes in order
14 to access my credit card accounts I have to get rid
15 of the cookies in order to be able to log back in.
16 That has happened probably four or five times in the
17 last two years.

18 Q When was the last time?

19 A The last time that happened I honestly
20 don't remember. It was more than four months ago, I
21 think.

22 Q Do you remember when before that?

23 A No, I don't. It's multiple times.

24 Q As a matter of practice you don't clear
25 your cookies?

1 A No.

2 Q I consider it to be a good practice to
3 have somebody assigned to clear my entire browser
4 cache if I die. Do you have anyone like that?

5 A I do not.

6 Q So is it because you never thought of the
7 idea?

8 A No. Generally -- first of all, I'm a
9 historian, so I dislike destruction of records.
10 Secondly, I'm very much an open person and I believe
11 very highly in the value of truth, so there's really
12 nothing that I have to hide. The only things I'm
13 concerned to hide are things that are someone else's
14 secrets or private information that I don't want to
15 disclose to harm them. Everything about myself I'm
16 not too concerned about other than obviously the
17 things I want to prevent the public from getting or
18 even hacking like my Social Security numbers and
19 stuff like that.

20 Q You've never cleared your browser history?

21 A Yeah, I've cleared browser history for
22 functional reasons, but not out of a desire to get
23 rid of the history.

24 Q When is the last time that you cleared it?

25 A I honestly don't remember. It's been a

1 long time since I've done that.

2 Q More than a year?

3 A Maybe less than a year, but close.
4 Something in that vicinity.

5 Q You can't recall when you did it?

6 A I can't recall.

7 Q You said Ms. Zvan's article -- in your
8 complaint it says the article garnered 45 comments.

9 A Um-hmm.

10 Q Did you make a list of people who
11 commented?

12 A Did I write down their names?

13 Q Yes.

14 A No, I did not.

15 Q Did you record them in any other way?

16 A I think we took a screen capture.

17 Q Do you know where those people live?

18 A I didn't check.

19 Q You don't know if any of them live in
20 Ohio?

21 A No. There was one -- we confirmed one
22 person, Marie Mogilevsky liked I think a Facebook
23 post, I can't remember exactly, related to this. We
24 did record that. That's because I knew she lived in
25 Ohio.

1 Q How do you know she lived in Ohio?

2 A She was a friend of mine.

3 Q Other than her the other 44 could all be
4 in Guam for all you know?

5 A I didn't research that. Correct.

6 Q So when Skepticon posted that they were
7 banning you, do you remember where you were when you
8 read that post?

9 A Yes. I was in Columbus, Ohio at the time.

10 Q Were you living here?

11 A Yes, I was living in Columbus and also
12 hanging out with one of my girlfriends in Columbus.
13 Yeah, that's what I remember about that.

14 Q Did you show her the post?

15 A Yes, we talked about it.

16 Q What did she think about it?

17 A She was as outraged as I was.

18 Q How long had you known her?

19 A We are talking about Amanda Metskas. That
20 is already on the public record.

21 Q I didn't need her, but okay.

22 A I have known her many years, but we had
23 been dating probably two years at that point.

24 Q Did you show anyone else?

25 A I may have. I don't recall.

1 **Q Did she believe it?**

2 A No. When you asked if I had shown anyone
3 else, did you mean on the day?

4 **Q No, at any time. I understand that your**
5 **answer was on the day, so we are not playing gotcha**
6 **with you.**

7 A You mean at any time?

8 **Q Yes.**

9 A All of my friends and girlfriends have
10 seen it by now.

11 **Q You showed it to them?**

12 A Yes.

13 **Q How did you pick who you would show it to?**

14 A People who would ask and people I'm in
15 close relationships that I think deserve to be aware
16 of it so we can discuss it.

17 **Q Did any of these people see it and believe**
18 **it instead of you?**

19 A No, none of the people that I was dating.
20 Certain people who were my friends did and aren't my
21 friends anymore.

22 **Q How do you know they believed it?**

23 A They told me.

24 **Q Can you tell me some of the friendships**
25 **you've lost over it?**

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1 A Again, we want to put these names in the
2 record?

3 Q I don't think this reveals anything
4 embarrassing about them.

5 A Neil Wehneman.

6 Q Anybody else that you had a falling out
7 with?

8 A Marie Mogilevsky.

9 Q Anyone else?

10 A Let's see, friends in Ohio. Those are the
11 two that I can recall have made clear that they have
12 believed it. There may have been others that
13 stopped talking to me that I don't know about
14 because they haven't communicated that to me. There
15 are other people in the community professionally not
16 friends per se, but are colleagues.

17 Q How are you doing on hunger at all? Do
18 you need a break?

19 MR. PERRY: It's up to you.

20 MR. RANDAZZA: I don't want you to feel
21 that I'm pushing you through it.

22 THE WITNESS: Understood. I'm fine.

23 BY MR. RANDAZZA:

24 Q Your blog is now at RichadCarrier.info?

25 A Yes.

1 Q And do you recall writing a statement or
2 an article called How To Do Wrong Right?

3 A Yup.

4 Q And the version that is on
5 RichardCarrier.info right now, has that ever been
6 edited since its publication?

7 A It may have been. I don't recall exactly
8 if I did or not.

9 Q So would you have a record of that?

10 A Yes. It's checkable if you go to the
11 Internet archive and see the previous versions of
12 it. That's true for any web page, actually.

13 Q You are sure that your website is
14 archived?

15 A Yes, I check it multiple times.

16 Q When you checked it, did you enter the URL
17 directly on the Internet archive page or did you
18 search for it on the Internet archive page? Did you
19 use the search function?

20 A I always use the URL.

21 Q And does the archive leave a cookie on
22 your computer?

23 A I do not know the answer to that.

24 Q You don't know if there is any meta data
25 left by the Internet archive on your computer?

1 A Correct, I do not know.

2 Q How many other Richard Carriers live in
3 Ohio?

4 A I don't know.

5 Q Have you ever tried to find out?

6 A I wouldn't know how to find out exactly.
7 Oh, actually, there's one way I tried when you
8 brought it up in motions. I think I checked the
9 voter registry in Ohio and it came up with I think
10 two other Richard Carriers. I can't remember the
11 exact count.

12 Q Did you ever look at Ancestry.com?

13 A No.

14 Q You have two registered voters named
15 Richard Carrier in Ohio?

16 A Yeah, that's what I recall.

17 Q You don't know how many others may have
18 lived here, may have died recently?

19 A No.

20 Q You don't recall if you searched for your
21 name with quotes or without quotes when you Googled
22 your own name?

23 A I don't recall.

24 Q Do you have any formal training in Google
25 analytics?

1 A Formal training, I do not. Can you hold
2 on for just a moment?

3 Q **Yeah.**

4 A Go ahead.

5 Q **Any formal training in Google trends?**

6 A No formal training.

7 Q **How did you learn to use it?**

8 A I read the tutorials and instructions on
9 the web page itself.

10 Q **Any training in SCO?**

11 A No formal training.

12 Q **Have you done anything on your blogs to
13 optimize search engine results?**

14 A I'm not sure what that means.

15 Q **How often do you log into your own blog
16 now?**

17 A What do you mean by log in? Are you
18 talking about the back end or the front end?

19 Q **Yes, the back end.**

20 A Probably once every other day would be the
21 average.

22 Q **I'm going to refer to something in the
23 file. This would be document number ten. Since
24 we've previously filed it, I don't know if you need
25 to read the whole thing. At this point you would've**

1 objected if it was a falsified copy, but for the
2 sake of formality it was Exhibit 1 to our ECF No.
3 10. Look at that and tell me if you think there is
4 any reason that that would not be a true and
5 accurate copy of what was published on the date
6 stated above. The publication date is June 5th,
7 2015. This copy was printed on 12/1/2016. Do you
8 have any reason to believe that you edited it
9 between the date it was published and the date we
10 printed it?

11 A I don't recall.

12 Q Is it your habit to adjust things once
13 you've already published them?

14 A I will on occasion if I think there's an
15 error in it.

16 Q Do you note that?

17 A I usually do in some fashion.

18 Q So you are transparent about edits?

19 A Usually. If it's a typo or something, no,
20 but usually I will put a comment or I will indicate
21 it using brackets or something that indicates a
22 difference from the text.

23 Q So can we stipulate that Exhibit 1 is a
24 true and accurate copy of this post and you have no
25 indication that it's been altered?

1 A Yeah.

2 Q I think it's just easier than entering it
3 as an exhibit to the deposition since it's already
4 in the record. Why add more paper to the record?

5 MR. PERRY: That's fine.

6 THE WITNESS: Yeah.

7 BY MR. RANDAZZA:

8 Q Have there been any exhibits that we have
9 provided that you believe to have been altered or
10 inauthentic? Can we stipulate to all of them?

11 MR. PERRY: I think we would have talked
12 about it.

13 THE WITNESS: Yeah.

14 MR. RANDAZZA: Let's go off the record.

15 (Thereupon, an off-the-record discussion
16 was had.)

17 MR. RANDAZZA: While we were off the
18 record the parties came to an agreement that we all
19 stipulate that any exhibits that have been filed to
20 date are authenticated whether submitted by the
21 plaintiff or the defendant and now we will go back
22 off the record so I can also enjoy the restroom.

23 (Thereupon, an off-the-record discussion
24 was had.)

25 BY MR. RANDAZZA:

1 **Q Have you ever been to the headquarters of**
2 **the Secular Student Alliance?**

3 A Yes.

4 **Q Where is it?**

5 A At that time it was -- no, I don't
6 remember the address. It was in Columbus.

7 **Q You went there in Columbus?**

8 A Yes.

9 **Q That is an Ohio only organization?**

10 A I don't understand the question.

11 **Q The Secular Student Alliance, where do**
12 **they have chapters?**

13 A All over the country.

14 **Q So it's not an Ohio focused organization?**

15 A The national office is in Ohio based in
16 Columbus and then it has affiliates, which are at
17 universities and college campuses all over the
18 United States. Those affiliates get support and
19 licensing and other things through the national
20 organization in Ohio.

21 **Q So when I say Secular Student Alliance, do**
22 **you understand me to be saying the Ohio headquarters**
23 **or all affiliates together with that?**

24 A I would assume both of those things.

25 **Q If I ask have you ever been to a Secular**

1 **Student Alliance meeting, we are talking about**
2 **nationwide?**

3 A Yes, if you ask me that question I would
4 ask you to be more specific as to what you mean.

5 Q **More specific than if you had been to a**
6 **Secular Student Alliance meeting?**

7 A Yes, because that can mean a lot of
8 different things.

9 Q **An event that any Secular Student Alliance**
10 **affiliate or national has sponsored?**

11 A Now I have lost track of the question.

12 Q **Have you ever been to one?**

13 A Yes.

14 Q **Have you ever been to an SSA -- can I say**
15 **SSA?**

16 A Yes, absolutely. Many, many. More than I
17 can remember.

18 Q **When was the last one?**

19 A It is now 2018. The last one would have
20 been late 2017, and I think there was only one in
21 2017, if I recall correctly. I'm not entirely sure,
22 but I think so, in Logan, Utah.

23 Q **So you went to one in Logan, Utah. Did**
24 **you speak at it?**

25 A Yes.

1 Q Did they pay you?

2 A Yes.

3 Q Am I remembering incorrectly, you were
4 banned for a period of time from SSA meetings?

5 A No.

6 Q You've never been banned from SSA?

7 A No, not officially.

8 Q What about before the Logan, Utah?

9 A What do you mean?

10 Q Were there any other events before Logan,
11 Utah or is there the only one that you've spoken at?

12 A There were many before, but that was the
13 only one in 2017.

14 Q What about 2016?

15 A None in the second half of 2016. Your
16 clients' statements have made that difficult.

17 Q Is that a fact, an opinion, a guess?

18 A It's a prediction based on data trends.

19 Q Is it because you tried to attend and they
20 told you you can't come?

21 A So before 2016 I used to get gigs at SSA
22 affiliate events and SSA national quite frequently.
23 I can't remember exact counts but many times in any
24 given year.

25 Q Would you apply to go or would they

1 **approach you?**

2 A A lot of times they would approach me.
3 That was fairly reliably the case. I would count on
4 business coming to me by people just asking me to
5 come. I would also go and ask groups can I speak
6 and it's usually enthusiastically a yes. That had
7 been my experience all through 2015. Starting mid
8 2016 and beyond it's completely the opposite.

9 Q **So in the second half of 2016, do you**
10 **recall any specific circumstances that you asked a**
11 **local affiliate of SSA or the national headquarters**
12 **of SSA if you could come speak and they said no?**

13 A No.

14 Q **2017?**

15 A No, not exactly like that.

16 Q **Nobody ever refused your request?**

17 A No one asked me and I can't recall if I
18 asked other people. Usually what happens and has
19 been happening in the last few years is I send a
20 request and I get no reply. They don't say anything
21 or they say something that's vague. People don't
22 usually tell me why. When I compare past behavior
23 with current behavior the difference is quite
24 obvious.

25 Q **But to answer my question, specifically no**

1 **one has told you no?**

2 A Not SSA affiliates. Well, they have not
3 said no, because of the defamation. A lot of them
4 just ghost me. They just don't answer at all or
5 they say no, but they don't say why.

6 Q **Do you use something to tell if the**
7 **e-mails have been opened?**

8 A I don't understand the question.

9 Q **Do you know what read notify is? Do you**
10 **use return receipts on e-mails?**

11 A No, I don't use return receipts on
12 e-mails. No, I don't check that that I can recall
13 anyway.

14 Q **That's how you would ask or would you**
15 **call?**

16 A That's a good question. Sometimes I do
17 send requests by Facebook and that I can confirm
18 whether someone has seen the message or not.
19 Oftentimes it's e-mail and oftentimes it's meet up
20 communications. Sometimes it's web form
21 communications that an affiliate operates. It's a
22 variety of communications depending on how they run
23 their contact.

24 Q **Who would receive the request?**

25 A It would vary. Each affiliate club has

1 its own officers and its own structure, so each one
2 would have its own policy as to who is getting the
3 communications. All I can do is compare past
4 behavior with current behavior of what usually
5 happens.

6 **Q Are they employees?**

7 A No. You mean like paid employees?

8 **Q Sure.**

9 A Not in the SSA.

10 **Q Independent contractors?**

11 A I have no idea what their legal relation
12 is to the SSA other than the fact that they organize
13 their own clubs and enter some sort of an agreement
14 with the national organization. I don't know the
15 details of that agreement.

16 **Q You've never talked to anyone at one of**
17 **the chapters and said who gets the requests?**

18 A Before 2016 I used to communicate with
19 these people, so I would find out because they would
20 answer.

21 **Q Do you know which SSA chapter is the**
22 **largest?**

23 A No, I do not know.

24 **Q Do you know any that are particularly**
25 **large?**

1 A No, I don't have those numbers.

2 **Q Is there any one that is more well known**
3 **or successful? Do any of them stand out?**

4 A I've never looked into that. Not to me,
5 anyway.

6 **Q Have you sent requests to national for**
7 **speaking engagements?**

8 A Are you talking about ever or when?

9 **Q How about since January of 2016.**

10 A January of 2016 I was planning to go to
11 the Columbus SSA national conference. I had
12 arranged a bunch of meetings with people who were
13 coming in from other affiliates. I was going to
14 engage in networking and try to get working gigs
15 through other affiliate organizations through
16 working a conference.

17 **Q Hold on. There is a lot of terms in there**
18 **that I would like clarification. So you were hoping**
19 **to go to a meeting?**

20 A I was arranging private meetings myself.

21 **Q With whom?**

22 A With many people all over the United
23 States who come to the conference representing
24 various SSA affiliates. My plan was to attend that
25 conference and hob knob essentially and network

1 basically try to develop other working
2 opportunities, but I was defamed almost immediately
3 before that and my meetings didn't happen and it was
4 made clear to me that I wouldn't be welcome at the
5 SSA conference.

6 Q Who told you that?

7 A That was communicated to me by -- well,
8 Amanda Metskas that she was relaying that to me from
9 persons at the SSA.

10 Q Who?

11 A It would have been --

12 Q Do you know? Were you privy to the
13 conversation?

14 A Was I privy to the conversation?

15 Q Yes.

16 A No, I only know what Amanda Metskas
17 communicated to me.

18 Q It's your testimony that Amanda told you
19 that you weren't welcome at the meeting?

20 A Right.

21 Q But you had arranged with other people to
22 meet you with at that meeting?

23 A I had done so prior, yes.

24 Q They were all coming to Columbus for the
25 conference?

1 A Right.

2 **Q What is Amanda's position at SSA?**

3 A She is not affiliated with the SSA. She
4 runs Camp Quest. She's married to who at the time
5 was president of SSA.

6 **Q So she has no affiliation with the SSA?**

7 A No, she just knows people who work there.

8 **Q A person unaffiliated with SSA --**

9 A Yes. At the time they shared an office,
10 so they actually worked in the same office.

11 **Q But she told you that you are not welcome,**
12 **but the organization never said you are not welcome?**

13 A She said the atmosphere was that everybody
14 thought it would cause a great deal of problems and
15 not go well if I attended the conference.

16 **Q That was her opinion?**

17 A Yes.

18 **Q But to be very clear here, to be very**
19 **precise, nobody who worked for the SSA, nobody who**
20 **is an officer or director, et cetera in the SSA told**
21 **you that you weren't welcome?**

22 A August Brunsman might have done so. I
23 don't recall specifically. He was the president of
24 the SSA at the time. He was recusing himself from
25 the investigation that was ongoing at the time. I

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1 had a lot of conversations with him, but I don't
2 remember exactly how much information I got from him
3 about this.

4 Q So you have no recollection of him telling
5 you that you weren't welcome?

6 A No, but this is the sort of thing we can
7 just ask them.

8 Q Are they chapters or affiliates? What is
9 the correct term?

10 A I've always used the term affiliates.

11 Q Did anybody from any of the affiliates
12 tell you you weren't welcome at their meetings?

13 A I can't recall. I know community groups
14 has said so.

15 Q What is community groups?

16 A Non SSA related organizations, secular
17 groups. I don't think I essentially got a fuck you
18 from SSA.

19 Q The people you said you were going to meet
20 with, did you meet with any of them?

21 A No, none of them are talking to me
22 anymore.

23 Q What about back then?

24 A No, they stopped all communications with
25 me as soon as the defamation was published.

1 **Q They previously arranged to meet with you?**

2 A Yes.

3 **Q How many people were there?**

4 A I don't recall. A handful.

5 **Q More than ten, more than twenty?**

6 A More than four, less than ten. I don't
7 recall the exact number. At the conference I was
8 planning on meeting more people without a planned
9 meeting. I was planning to hob knob. I was
10 intending to cultivate meetings at the conference.

11 **Q Had you bought a ticket?**

12 A I don't even know if they sell those for
13 people attending. I was going to. That was the
14 plan. As soon as I realized this wasn't going to
15 transpire I did not.

16 **Q That what wasn't going to transpire?**

17 A As soon as the defamation was published
18 and all the shit hit the fan.

19 **Q Which specific defamation?**

20 A That would have been Amy Frank's
21 publication is the first start of it. All of it
22 really hit on June 20, I think, when the other
23 publications went out, Skepticon, Lauren Lane. When
24 they all published. That really had the impact.
25 Not that the Amy Frank thing helped either.

1 Q You have no specific evidence of that, you
2 are just extrapolating that these people talked to
3 you before and they don't talk to you now?

4 A Right.

5 Q No one has said it was because of this
6 publication?

7 A No, but I'm sure if we ask them we can get
8 that information from them.

9 Q You don't think any of your publications
10 could have had anything to do with it?

11 A No, none of my publications contain
12 defamatory material like this.

13 Q Did you provide any of the names -- and
14 maybe your attorney can answer this, did you provide
15 any of the names of the people you were planning on
16 meeting with in your disclosures?

17 A No.

18 MR. RANDAZZA: You want to supplement
19 those in a short period of time? I don't think we
20 know any of those names.

21 BY MR. RANDAZZA:

22 Q Have you ever been formally accused of
23 sexual assault?

24 A No.

25 Q By formally I don't mean just by the

1 **police, but has any person ever?**

2 A No, not before Amy Frank.

3 **Q Harassment?**

4 A No.

5 **Q I know you don't like this term after**
6 **reading your blog, but being creepy toward anyone?**

7 A What's the question?

8 **Q Well, there's sexual assault. I think we**
9 **know what that is.**

10 A Um-hmm.

11 **Q There is rape, maybe sexual assault is**
12 **also rape. Descending we have sexual harassment and**
13 **then maybe we just have creepy, which is sort of the**
14 **male equivalent -- you've written it's the male**
15 **equivalent of slut shaming.**

16 A Formulate your question. I don't know
17 what you're asking.

18 **Q Has anyone ever described your behavior at**
19 **any of these conferences as creepy?**

20 A I don't recall if or when.

21 **Q Do you recall ever sexualizing a**
22 **conversation that was about something else at any of**
23 **these conferences?**

24 A I'm not sure I understand the question.

25 **Q Well, I'm reading from your words. This**

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1 is creepy. One you sexualized a conversation that
2 was about something else. This alone justifies the
3 label creepy. What did you mean when you wrote
4 that?

5 A I mean someone who -- a conversation about
6 something else and then suddenly just start
7 interjecting discussions of sex that the other party
8 hasn't raised.

9 Q Did you ever sexualize a conversation with
10 a proposition at one of these events?

11 A You mean like just asking if someone wants
12 to go out with you?

13 Q Again, I'm reading from your list of
14 what's creepy. If you don't know what you meant
15 when you wrote it --

16 A I need the context of what you're asking.
17 I'm not quite clear on what the question is.

18 Q You sexualized a conversation with a
19 proposition, you didn't just bring up sex out of the
20 blue. You did it in the form of an unwelcomed
21 sexual advance.

22 A Wait. Read that again.

23 Q On June 5th, 2015 on page 22 of 47 of
24 the aforementioned Exhibit 1 to our Document 10, you
25 write a list. It looks like you are doing a list of

1 things that you would say are creepy. One thing you
2 say is two, worst, this is worse than sexualizing a
3 conversation the thing we just talked about. You
4 sexualize the conversation with a, italics,
5 proposition. You didn't just bring up sex out of
6 the blue, you did it in the form of an unwelcomed
7 sexual advance.

8 A Are you sure you are reading my words?

9 Q I am.

10 A Can I see that?

11 Q You may.

12 A Where is it?

13 Q Read from there and then the next page.

14 A This is someone else's words. It's Hyatt
15 (phonetic) girl June 5, 2015. These are not my
16 words. This is someone else accusing me of being
17 creepy.

18 Q So you disagree with her list there?

19 A It would be one of those things I would
20 have to engage in a conversation about what exactly
21 she means. I would not choose any of that wording.

22 Q How often do you talk about sex with the
23 students that attend the SSA meetings?

24 A Say again.

25 Q Do you ever talk about sex with the

1 **students that attend SSA meetings?**

2 A Yes, if they bring it up.

3 **Q Only if they bring it up?**

4 A Generally, yeah. There has to be a reason
5 for that to come into conversation.

6 **Q Can you recall how many times that has**
7 **happened?**

8 A No, I can't recall how many times that's
9 happened.

10 **Q Did you say before or did I read before**
11 **that you asked Amy Skiba if she would date you?**

12 A No.

13 **Q I know there was a time we were talking**
14 **about what verb, right?**

15 A Yeah. Right.

16 **Q You propositioned sex to her?**

17 A I did not.

18 **Q She propositioned you?**

19 A She did not.

20 **Q So there was nothing that happened there?**

21 A You just --

22 **Q I'm trying to keep these women --**

23 A You left out a huge category of things.

24 **Q So what happened there?**

25 A She spoke to me and said she wanted to

1 open her relationship. She was having difficulty
2 because her husband wasn't agreeing to it and was
3 also monitoring her communications. He was spying
4 on her e-mail and things like that.

5 **Q She wanted to open her relationship with**
6 **him or you?**

7 A She didn't specify. She was I guess
8 asking me for advice about what to do. I told her
9 it's a difficult situation. I don't know how she
10 could deal with a partner who is spying on her. In
11 the course of that conversation I mentioned that if
12 her situation ever does change, you have an open
13 relationship and you solve this problem and you are
14 interested in me, you are welcome to ask me out in
15 the future sometime.

16 **Q This was on the phone?**

17 A No, in person.

18 **Q Where?**

19 A In the living room of the house of Forest
20 Schrike (phonetic) I think is where I was staying.
21 This was the morning after I spoke for her
22 organization and it was a private conversation she
23 initiated with me. It's discussed in my affidavit
24 with the complaint.

25 **Q Did you or did you not announce at one of**

1 **these SSA events that you had a vasectomy?**

2 A So the night before that we were in a
3 group conversation and -- this you can confirm from
4 Spencer Hawkins who was there. His affidavit is in
5 the complaint. Everybody there that was talking was
6 bringing up the subject of sexual stamina and the
7 role of alcohol on it and I brought up the effect of
8 my vasectomy on this. This conversation was
9 entirely with the men who were discussing this. It
10 was not directed at Amy Frank. It was not
11 whispered. It was openly discussed and then we
12 moved on to another subject after that.

13 **Q Amy Frank wasn't there?**

14 A Amy Frank was there and seemed to be
15 enjoying the conversation and didn't issue any
16 objections or leave.

17 **Q You said you were only speaking to the**
18 **men?**

19 A They were the ones who were having this
20 conversation with me of sexual stamina and what
21 affects it.

22 **Q How many women were there?**

23 A Just her.

24 **Q But she didn't participate in the**
25 **conversation?**

1 A I don't recall.

2 MR. RANDAZZA: Off the record.

3 (Thereupon, an off-the-record discussion
4 was had.)

5 (Brief recess.)

6 BY MR. RANDAZZA:

7 Q Sir, you wrote a blog post where you said
8 that you were never employed by SSA or Camp Quest;
9 is that correct?

10 A Yes, by which I meant I was never a
11 salaried employee.

12 Q Okay. And you were dating the executive
13 director of Camp Quest?

14 A Correct.

15 Q Amanda?

16 A Yes.

17 Q What is Amanda's last name?

18 A Metskias.

19 Q And Amanda is married to?

20 A August Brunsman.

21 Q And August is the executive director of
22 the Secular Student Alliance?

23 A I should say he was at the time.

24 Q There was an incident where somebody
25 complained to the Secular Student Alliance about you

1 **and the Secular Student Alliance contacted you?**

2 A Yes.

3 Q **Who did you think it was that complained**
4 **about you?**

5 A The pub case that we talked about earlier.
6 That was the only instance in which I had asked a
7 woman out at any event that had anything to do with
8 a college group.

9 Q **It turned out it wasn't her?**

10 A Yeah.

11 Q **So it turned out it was Amy?**

12 A Yes, which surprised me immensely.

13 Q **It might have been a little bit**
14 **embarrassing to say somebody complained about you**
15 **and you say -- who did you think it was?**

16 A Ms. F.

17 Q **But that's not the incident we were**
18 **talking about?**

19 A Yes, and that was like falling down a
20 rabbit hole. It was really perplexing to me.

21 Q **You then went to another SSA event?**

22 A Give me specifics.

23 Q **Did you go to another SSA event after that**
24 **phone call?**

25 A Yes.

1 Q **Were you aware that Amy Skiba was there?**

2 A You are talking about a specific event?

3 Q **How many SSA events did you go to after**
4 **this?**

5 A I can't recall, but it may have been more
6 than one.

7 Q **Do you recall going to one Amy was at?**

8 A Yes, although I didn't know she was at
9 that until they told me.

10 Q **They told you. Who is they?**

11 A I don't remember the exact name of the
12 exact person who told me, but a staff member of the
13 SSA contacted me and this is actually the first time
14 that I found out that it was Amy who had complained
15 about me as they said, you know, Amy Skiba is here
16 and she is uncomfortable that you are here as well.
17 Could you please just avoid her. I had to ask like
18 who is Amy Skiba? I don't know who you are talking
19 about and they said oh, yes, that's the person who
20 complained about you. I'm like okay, I'm not going
21 to get into this conversation because I have no idea
22 what on earth she was complaining about, but I have
23 no problem. If anybody wants me to stay away from
24 them, that's easily done, so I said yeah, that's no
25 problem. I complied with their wishes.

1 **Q And this is before the allegedly**
2 **defamatory publications?**

3 A Correct. This was 2015.

4 **Q When you were taken off the speakers**
5 **bureau for SSA, was that before the alleged**
6 **defamatory publication?**

7 A Yes.

8 **Q Did anyone say why you were taken off the**
9 **speakers bureau?**

10 A To me or to the public?

11 **Q To either one.**

12 A They told me that they wanted to have a
13 zero tolerance policy on the fraternization policy,
14 so they said we have decided -- they didn't decide
15 this originally, but they eventually decided you
16 probably shouldn't be on the bureau and I said yeah,
17 I probably shouldn't be on the bureau.

18 **Q So you agreed that due to fraternization**
19 **issues it's better to be --**

20 A Yes, I would rather not have a restriction
21 on fraternization.

22 **Q Do you still have anything in storage in**
23 **California?**

24 A No.

25 **Q What did you get in the divorce?**

1 A Full ownership of my business and \$20,000.

2 Q Is that a California divorce or an Ohio
3 divorce?

4 A California.

5 Q When was the final decree entered?

6 A Sometime in 2015.

7 Q Now, this may indicate attorney/client
8 privilege. Did you consult with any California
9 lawyers prior to filing this case?

10 MR. PERRY: Object to form. You can
11 answer.

12 THE WITNESS: No.

13 BY MR. RANDAZZA:

14 Q In some of your writings online, is it
15 true that you wrote a post discussing gang bangs?

16 A Yes.

17 Q That God likes gang bangs?

18 A Yes.

19 Q Do you recall when you published that?

20 A I don't remember. It was a few years ago.

21 Q Discussed semen play online?

22 A I have done, yes.

23 Q Violence in porn?

24 A Yup.

25 Q You submitted attached to your complaint

1 **Exhibit 27 an e-mail to a woman named -- can you**
2 **tell me how to pronounce her name?**

3 A Heina Dadabhoy.

4 Q **Tell me about that e-mail.**

5 A It was a whole e-mail exchange. I don't
6 know which one you mean.

7 Q **This is one where there was some**
8 **discussion of you wanting to have sex with her.**

9 A Yeah.

10 Q **Essentially calling it are you down to**
11 **fuck?**

12 A That's not what I called it.

13 Q **Who called it that?**

14 A Her.

15 Q **Who is Heina?**

16 A Heina Dadabhoy is a blogger and activist
17 in the secular community.

18 Q **Has she complained to anybody about your**
19 **conduct?**

20 A I'm sure she has in the same respect that
21 she does in the e-mails that we included in the
22 complaint.

23 Q **Back to the gang bang article. The title**
24 **was God Thoroughly Enjoys Getting Gang Banged?**

25 A Correct.

1 **Q Did anyone express concerns about this**
2 **article?**

3 A I don't recall.

4 **Q No one ever complained?**

5 A They may have. If they did, it was pretty
6 minor and I didn't think much of it.

7 **Q There is an article that you published**
8 **regarding accusations by Amy Frank; do you recall**
9 **that?**

10 A There may have been more than one.

11 **Q Was there a woman named Shelley that**
12 **complained about you?**

13 A No.

14 **Q Do you know anyone named Shelley?**

15 A I do.

16 **Q Tell me about your relationship with her.**

17 A The person that I know whose name is
18 Shelley?

19 **Q Yes.**

20 A Can we put the last name off the record?

21 **Q Sure.**

22 **(Thereupon, an off-the-record discussion**
23 **was had.)**

24 BY MR. RANDAZZA:

25 **Q Did you ever have an incident involving**

1 **her?**

2 A No.

3 Q **What is your relationship with her?**

4 A We are good friends.

5 Q **Is that all?**

6 A Oh, yes.

7 Q **No sexual contact with her?**

8 A No.

9 Q **In your article on June 15th regarding the**
10 **accusations made by Amy Frank --**

11 A Which article?

12 Q **Here is the beginning of it.**

13 A Got it.

14 Q **This one was attached to document 23-1.**

15 **This is the one where you say I'm not an employee of**
16 **either Camp Quest or SSA or any of their affiliates**
17 **and you say nor am I on their board of directors or**
18 **their speaker bureaus?**

19 A Correct.

20 Q **I rarely even volunteer for them?**

21 A Correct.

22 Q **Do you have anything else specifically**
23 **except for, you know, I think we talked before the**
24 **break about the fact that you are essentially**
25 **extrapolating that one of the defendants should have**

1 known that you moved to Ohio because she looked at
2 other things on your Facebook wall that would
3 have -- you think she saw one thing, she would have
4 seen everything?

5 A Yes.

6 Q Do you have any other specific information
7 about any of the other defendants as to why they
8 might know?

9 A Yes.

10 Q Why don't we go through them one by one?

11 A So Zvan and the Orbit have both admitted
12 on discovery that they knew before I filed suit.
13 Myers, I told him personally on a phone call that I
14 had moved to Ohio and he being the CEO of
15 Freethought Blogs --

16 Q When was that conversation with Myers?

17 A The 21st of June. I have that in a
18 record. Very soon to that, though. Myers being the
19 CEO of Freethought Blogs, I consider that informing
20 Freethought Blogs. Normally if you tell the CEO of
21 a company something, that's telling the company.
22 Who is left?

23 Q Skepticon?

24 A Skepticon and Lane through counsel sent a
25 letter to my lawyer in Ohio. I would expect a

1 competent lawyer to advise them on the potential
2 jurisdictional issues.

3 Q Your lawyer --

4 A Received a letter from Lane and Skepticon
5 through counsel.

6 Q That letter came to you before -- well,
7 after the publications, correct?

8 A Yes, it was a response to our desist
9 letters before we sued.

10 Q Any information that Skepticon was aware
11 of your location prior to receiving the demand
12 letter from your lawyer?

13 A Rephrase that question.

14 Q Your lawyer sent a letter to Skepticon?

15 A Correct.

16 Q At that moment it is at least your belief
17 that everybody is on notice that you are an Ohioan
18 and thus if they defame you, they'll come to court
19 in Ohio?

20 A It's certainly a risk.

21 Q However that letter from your lawyer was
22 after the date of publication?

23 A Correct.

24 Q As far as prepublication, do you have
25 anything as far as Skepticon knowing that you were

1 **in Ohio?**

2 A For Lane and Skepticon, no.

3 **Q What about Amy Frank-Skiba?**

4 A Amy Frank was searching for events and
5 stuff on my Facebook page before. In fact, it was
6 that searching that resulted in her posting her
7 defamation when she saw the Camp Quest notice. The
8 fact that she saw the Camp Quest notice means that
9 she had to have seen other things that she was
10 looking for. Specifically the thing she said she
11 was looking for, which means she would have seen the
12 notice.

13 **Q We asked you in discovery and you**
14 **mentioned that you are going to supplement for**
15 **things like credit card statements?**

16 A Yeah.

17 **Q Would you generally pay cash or credit?**

18 A I almost always use ATM or credit.

19 **Q Your bank statements and credit card**
20 **statements would reflect a reasonable picture of**
21 **your whereabouts on any given day?**

22 A Probably, yeah, to within the extent I am
23 using them on particular dates and you can figure
24 out where the charges are.

25 **Q Do you intend to produce those to us?**

1 A It's super arduous. It's going to cost a
2 lot of time. Do you really need them?

3 **Q We do.**

4 MR. RANDAZZA: Off the record.

5 (Thereupon, an off-the-record discussion
6 was had.)

7 MR. RANDAZZA: We had an off the record
8 discussion about one discovery dispute that we
9 appear to have resolved, that is to produce the
10 bank records and credit card records for the past
11 36 months, at least 36 months preceding the
12 lawsuit. We have agreed that the defense will not
13 put any of the account numbers in the record. The
14 defense will also endeavor to put the least amount
15 of that information in the record. At this point
16 our intent is to simply verify locations through
17 it. I don't foresee any other use for it. If
18 there's anything that appears like it might be a
19 privacy issue, we would like to know. You can
20 probably let us know when you produce it. If there
21 is a charge to a sensitive purchase, please feel
22 free to highlight it.

23 BY MR. RANDAZZA:

24 **Q There was a statement that you discussed**
25 **online where somebody was accusing you of misconduct**

1 **and hitting on younger students. You consider that**
2 **ageism?**

3 A Can you --

4 Q **I'll get back to that. Was there an SSA**
5 **policy against hitting on students?**

6 A The SSA fraternization policy essentially
7 said that, yes, for people on the speakers bureau.

8 Q **Did you violate that policy?**

9 A I did.

10 Q **Do you recall when the phone call was with**
11 **PZ Myers where you told him that you were moving to**
12 **Ohio?**

13 A Not offhand. I think in some of the
14 materials or briefs that we filed we entered that
15 information and I base that information off of my
16 cell phone records.

17 Q **So was it pre or post allegedly defamatory**
18 **articles?**

19 A Post because it was a phone call about
20 that.

21 Q **So you called Myers after the publication?**

22 A He called me, actually.

23 Q **He called you?**

24 A He called me to discuss Freethought Blogs'
25 investigation of me for the claims made and that's

1 the conversation I referenced earlier. That
2 conversation started with him apologizing for
3 calling so early. He thought I was in California
4 hours ahead of him. I said no, I actually moved to
5 Ohio. I'm actually hours later than you or an hour
6 or two later than you.

7 **Q He definitely believed at that point you**
8 **lived in California?**

9 A Certainly.

10 **Q But the publication had already happened?**

11 A Correct. And that was the conversation
12 where I explained to him that if he didn't retract I
13 would have to sue. That was before the desist
14 letters. I hadn't even spoken to a lawyer yet.

15 **Q So none of the events discussed in these**
16 **written statements took place in Ohio?**

17 A None of the events?

18 **Q Your violation of the SSA policy, for**
19 **example?**

20 A One of them did.

21 **Q Which sexual harassment took place in**
22 **Ohio?**

23 A It wasn't sexual harassment.

24 **Q What was it?**

25 A Ms. F, that encounter occurred at Case

1 Western University in northern Ohio.

2 MR. RANDAZZA: All right. I can turn
3 this over to your lawyer for cross.

4 THE WITNESS: One thing, we kind of left
5 that one hanging. There were a certain number of
6 factual issues in there. Do we want to go over
7 those in this deposition or is there some other way
8 to handle that?

9 MR. PERRY: Let's do that now.

10 CROSS-EXAMINATION

11 BY MR. PERRY:

12 Q Because I'm going second, if I jump around
13 or if I ask a poorly worded question, let me know
14 and I'll rephrase the question. Why don't we cover
15 that now and I will ask you to explain the factually
16 accurate version of that story.

17 A Well, the facts that have been
18 inaccurately reported and some of these were
19 inaccurately reported by me originally is that when
20 I wrote the article that we are talking, How To Do
21 Wrong Right or whatever that title was, at the time
22 that I wrote that and at the time that the SSA
23 contacted me, and I believe that was the incident
24 that I was being accused of, which turned out not to
25 be, I thought that was an SSA event. Once the legal

1 case started and I started researching and fact
2 checking the information I realized that it wasn't
3 an SSA event and it was not covered by the SSA
4 fraternization policy. I think that's the only
5 thing.

6 Q Are there any other factual inaccuracies
7 in that story?

8 A I can't remember the line that was read.
9 There may be other factual inaccuracies.

10 Q I want to ask you a couple of questions
11 relative to the nature of the defendants'
12 statements. Earlier you discussed, but I want you
13 to be specific here, is there any truth to the
14 defendants' allegations of sexual assault?

15 A No.

16 Q Is there any truth to the defendants'
17 allegations of sexual harassment?

18 A No.

19 Q Specific to Ms. Frank-Skiba's statements,
20 she claimed that her accusations were all personal
21 knowledge?

22 A Yes.

23 Q And what did she accuse you of?

24 A She accused me of sexual harassment and
25 sexual assault and also said that she had personal

1 knowledge of, quote unquote, other victims.

2 Q Is there any way that Ms. Frank-Skiba
3 could have personal knowledge of such things?

4 A No.

5 Q Why not?

6 A Because no such things occurred.

7 Q And then specific to Ms. Lane, she also
8 alleged personal knowledge of wrongful conduct?

9 A Yes.

10 Q Is there any way that she could have
11 personal knowledge of such conduct?

12 A No, not such that would violate the sexual
13 harassment policy at Skepticon.

14 Q What did Ms. Lane accuse you of that was
15 false and damaging to you?

16 A Violating a sexual harassment policy at
17 Skepticon.

18 Q Is there any way she could have personal
19 knowledge of such a thing?

20 A No.

21 Q Why not?

22 A Because no such thing occurred.

23 Q Did anyone acting on Ms. Lane's behalf
24 contact you for your version of the story?

25 A No.

1 Q How about anyone representing Skepticon,
2 did they contact you for your side of the version of
3 the events?

4 A No.

5 Q Moving on. Similar line of questions as
6 to Ms. Zvan. She claimed to have personal knowledge
7 of at least one other incident. Can you describe
8 what she claimed?

9 A She has alleged now six incidents, so it
10 would depend on which one you are talking about and
11 in every single case she reported is not true.

12 Q No way she could have personal knowledge?

13 A No.

14 Q Do you know who told her about those
15 incidents that she alleges?

16 A No.

17 Q She claims to have heard about at least
18 one alleged incident from a third party?

19 A Right. Yes.

20 Q How could she have personal knowledge of
21 such a thing?

22 A I don't know. It's not possible.

23 Q And did Ms. Zvan contact you to get your
24 side of the story.

25 A No.

1 Q Did anyone representing the Orbit ever
2 contact you to get your side of the story?

3 A No.

4 Q Did any of the defendants ever reach out
5 to you before they published false statements about
6 you?

7 A No. The only exception would be Myers who
8 phone called me after their first article, but then
9 we discussed that conversation already.

10 Q With respect to your business, writing,
11 speaking, teaching as a source of income, do you
12 know the approximate size of that market? I
13 apologize for referring to it as the market. The
14 community. The ecosystem to which you earn your
15 living, tell me about that.

16 MR. RANDAZZA: Object to form.

17 THE WITNESS: Yeah. My blog reaches over
18 a hundred thousand readers and my financials for
19 the year 2015 is a good example of sales.

20 BY MR. PERRY:

21 Q What I'm asking is not just what your
22 footprint is, but how big is this market?

23 A Nationwide or worldwide?

24 Q Nationwide for right now.

25 A Nationwide it's well over a hundred

1 thousand individuals who are within my market.

2 **Q Do you know how many conventions are held**
3 **each year that are a part of that?**

4 A It varies by year but it's about ten to
5 twenty conventions related to the secular community
6 in one form or another.

7 **Q Tell me one or two of the most prominent**
8 **conventions.**

9 A Skepticon is one of the larger ones. It
10 often draws audiences in the vicinity of a thousand
11 people. American Atheist, their conferences are
12 about comparable in size. I don't know if it's
13 still going on this year, but in previous years
14 there was ReAsoncon, Apostacon, many others.
15 Atheist Alliance America has one. These have
16 attendances usually 3- to 600. There's a variety of
17 other smaller conferences that have 2- or 300
18 attendees.

19 **Q The attendees for all of these conferences**
20 **that you just mentioned, they are people that you**
21 **would consider your audience or potential audience?**

22 A Yeah, it's market access. Only a fraction
23 of the market can attend these conventions. When I
24 go to these conventions and speak at them, I'm not
25 only exposing my work to the attendees but also they

1 go out and talk about it.

2 Q Let's start with Freethought Blogs
3 Network, how influential would you say that
4 organization is within the community?

5 A It is almost certainly the most read blog
6 network in the secular community that is devoted
7 solely to the secular community. Its readership is
8 approximately 1.4 million.

9 Q Orbit, do they have a sizeable reach in
10 this community?

11 A Yes. Average reach I think is 200- to
12 400,000 readers. They are probably the second most
13 secular website that's devoted specifically to that.

14 MR. RANDAZZA: Objection. Foundation.

15 BY MR. PERRY:

16 Q How about Skepticon, can you describe how
17 influential their role is in this community?

18 MR. RANDAZZA: Objection to form.

19 THE WITNESS: They are a much admired
20 conference. They are a conference leader in terms
21 of what other conferences look to.

22 BY MR. PERRY:

23 Q Mr. Randazza asked you earlier questions
24 relative to your professional relationships and
25 business expectances within Ohio. How long did you

1 **say you were affiliated with Secular Student**
2 **Alliance?**

3 A For more years than I can remember.

4 Q **Before 2016?**

5 A Absolutely.

6 Q **At the time of the defendants' false**
7 **statements, do you know whether the defendants were**
8 **aware of your affiliation with SSA?**

9 A Yes.

10 Q **All of them?**

11 A Yes.

12 Q **How do you know that?**

13 A Because either I've spoken to all of them
14 about events that I've done for the SSA or they've
15 been well aware of it and talked about it
16 themselves.

17 Q **Did you personally know each of the**
18 **defendants before June of 2016 when their statements**
19 **were first published?**

20 A I don't know how to answer that for
21 Freethought Blogs.

22 Q **How about Myers?**

23 A Yes, Myers for sure, many years. Zvan,
24 many years I personally knew her. Amy Frank for the
25 one SSA event that I did.

1 **Q You know she knew you?**

2 A She knew me from before not personally,
3 but professionally she knew me as a figure in the
4 community. That's why she had me come out to speak
5 for her organization.

6 **Q Lane?**

7 A Yes, I knew Lane.

8 **Q These are all prior to 2016?**

9 A Yes.

10 **Q Was it common knowledge that the SSA was**
11 **in Ohio?**

12 A Yes.

13 MR. RANDAZZA: Objection. Form.

14 BY MR. PERRY:

15 **Q How long have you been affiliated with**
16 **Camp Quest?**

17 A Longer than I can remember.

18 **Q Before 2016?**

19 A Yes.

20 **Q At the time of the statements alleged in**
21 **this lawsuit, do you know whether the defendants**
22 **were aware of your affiliation with Camp Quest?**

23 A Yeah -- wait. At what time?

24 **Q Previous to their statements, so previous**
25 **to mid 2016, each of the defendants, would they have**

1 **known that you had an affiliation with Camp Quest?**

2 A Lane would have known because we spoke of
3 it many times before.

4 **Q Frank-Skiba?**

5 A I don't know about the other defendants if
6 they knew before the statements.

7 **Q Zvan?**

8 A I don't know.

9 **Q Myers?**

10 A I don't know.

11 **Q Okay. Was it common knowledge that Camp**
12 **Quest was in Ohio?**

13 A It was fairly common knowledge.

14 **Q Around the time just previous to these**
15 **damaging statements, tell me -- just explain briefly**
16 **about your livelihood and the business that you were**
17 **building in Ohio?**

18 A Right. So I started building my business
19 in Ohio in 2015. That shows in the financial
20 documents we have given on discovery. I started
21 developing business relationships with numerous
22 organizations that hired me to speak and sell my
23 books there and promote my work. Those are the
24 three prongs of my in-person business, which is
25 getting the promotion opportunities and being able

1 to sell books and get speaking fees, if that's the
2 case, so I did that in 2015 and I was all ready to
3 do that in 2016. I didn't book any gigs in Ohio in
4 the first half because I knew I was moving. I knew
5 it would be a waste of expense if I were to get
6 events in Ohio before I moved, so I planned to build
7 all of my 2016 events in the second half of 2016
8 after I moved, but that's unfortunately the moment I
9 moved right after that that the defendants'
10 statements came out and that prevented that from
11 happening.

12 **Q Earlier today we discussed how your move**
13 **to Ohio was publicized ahead of time. I want to**
14 **clarify, before moving, did you ever discuss your**
15 **move with any of the defendants and if so which**
16 **ones, which group of friends?**

17 A Owners and operators I think were Greta
18 Christina and Marie Mogilevsky were both informed of
19 my move before I moved.

20 **Q Before the move did you directly speak to**
21 **the defendants about your intentions to move to**
22 **Ohio?**

23 A Just those members of the Orbit.

24 **Q Did you publicize the reason for your move**
25 **to Ohio?**

1 A Yes -- oh, wait. Actually, I'm not sure
2 if I wrote about the reason. I can't remember.
3 It's been so long since I wrote my move blogs.

4 **Q Before the statements were published, did**
5 **you ever discuss the reason for your move to Ohio**
6 **directly with any of the defendants?**

7 A I don't remember.

8 **Q How did the defendants specifically target**
9 **your affiliation with Secular Student Alliance**
10 **and/or Camp Quest?**

11 A Frank's post which started the whole
12 thing, she basically essentially says I will be a
13 threat to children and if there was anyone working
14 with Camp Quest who would want to be affiliated with
15 me and therefore Camp Quest couldn't suffer the
16 ignominy of being affiliated with me and
17 specifically said the same thing that SSA should be
18 boycotted until all of this.

19 **Q So she did call for a boycott?**

20 A Yeah.

21 **Q She called for a boycott with --**

22 A She wanted the entire leadership of the
23 SSA to be dismantled. I think it's quite clear the
24 reason for that is she wanted people like me to be
25 no longer able to speak at those things. That's

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1 kind of the reason why she wanted management gone.

2 Q At that time she would have known that
3 these organizations were in Ohio?

4 A Yes.

5 Q At that time do we know whether she knew
6 that you were living in Ohio?

7 A At the time she wrote --

8 MR. RANDAZZA: Objection. Foundation.

9 THE WITNESS: She had to have known based
10 on the arguments and the points that I made
11 earlier.

12 BY MR. PERRY:

13 Q How do you know that she knew you were
14 living in Ohio?

15 A Because she has admitted that she was
16 constantly searching my Facebook wall for
17 announcements of events and things that I was
18 attending and she was watching the results so
19 closely that she saw even nonevent announcements, so
20 she can't have failed to see the move posts,
21 especially because she was looking at university
22 event announcements and one of move posts are about
23 a university event announcement.

24 Q This is before she called for a boycott?

25 A Exactly.

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1 **Q I think you already testified about Camp**
2 **Quest and Secular Student Alliance suspending**
3 **promotional and business projects. Were there any**
4 **other business projects that you were developing**
5 **with either of those two organizations before they**
6 **were canceled?**

7 A Yes, I was in negotiations with Camp Quest
8 to run a nationwide science experiment through the
9 national office in Ohio. That would have resulted
10 in research paper and publicity and prestige.

11 **Q And that was canceled?**

12 A Yes, Camp Quest could no longer associate
13 with me once I had this stigma.

14 **Q Before the defendants' statements, were**
15 **there any other Ohio-related business opportunities**
16 **that were underway or in development at the time?**

17 A Not underway, but I had suspected to do
18 what I usually do in my home state which was to
19 start developing more gigs at all the organizations
20 but since then several members of those
21 organizations have published clearly that they had
22 no interest in hiring me because of the defamation.

23 **Q Tell us about how the defendants'**
24 **statements have affected your professional**
25 **reputation?**

1 A I run into problems all the time where
2 oftentimes even my scholarship will be questioned.
3 People will say who wants to listen to a sexual
4 harasser. I have to deal with those kind of insults
5 a lot. I'm mocked for this especially since I want
6 to try and write about feminism and social justice.
7 I'm mocked and insulted because I'm accused of being
8 a hypocrite. Other effects on my reputation in
9 terms of being a threat to children and women.
10 People don't want to hire me at events. And I often
11 have to deal with a double edge sword on this, if I
12 try to build a contract to work for an organization
13 usually what will happen is someone will come along
14 and point out the defamation to the organization and
15 I'd get disinvited or there's a big fight on the
16 board of directors and so I have to deal with the
17 stress of that and that makes it more difficult for
18 them to hire me in the future and that's just the
19 few that I can think of right now.

20 **Q Could you explain how the defendants'**
21 **conduct in this case has affected you emotionally?**

22 A Yeah. Extraordinary stress and anxiety.
23 I feel like being gas lighted about it. I lost
24 ten pounds in the first six -- less than six months
25 after the defamation started. It's difficult in

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1 personal relationships because I have to deal with
2 the difficult conversations and it's hard to date
3 because how do you date someone and have to tell
4 them about this. If you don't tell them about it,
5 they find out about it later and then you're like
6 are they going to hate you for it. There's a lot of
7 anxiety and worry because of that. There's tons
8 more in terms of this. The anxiety and worry is
9 constant. Even having to fight the case. Every
10 time that I have to respond to defense motion I have
11 to revisit these lies that were said about me and
12 that's painful.

13 **Q After they published their statements you**
14 **served each of the defendants with a cease and**
15 **desist letter, right?**

16 A Yes.

17 **Q Each of the defendants received a cease**
18 **and desist letter?**

19 A They each received it. Lane keeps saying
20 that she didn't, but Skepticon did, but we sent it
21 to her as an officer of Skepticon to the Skepticon
22 address, so I would count that as her having
23 received it.

24 **Q Any of your letters returned as**
25 **undeliverable?**

1 A I don't think so.

2 Q So cease and desist letters were sent from
3 Ohio, right?

4 A Yes.

5 Q And you demanded a retraction, correct?

6 A Yes.

7 Q After the defendants received these
8 letters did any of them retract their statements or
9 did they double down?

10 A They double downed or didn't retract.

11 Q Did any of the defendants make public a
12 copy of your cease and desist letter?

13 A Amy Frank did.

14 Q I think we've already discussed a little
15 bit that Skepticon and Lane replied to the cease and
16 desist letter, right?

17 A Yes.

18 Q And that should cover whether or not Lane
19 received a copy of the cease and desist letter?

20 A Right.

21 Q They mailed that reply to Ohio?

22 A Yes.

23 Q Did that reply allege a breach of
24 contract?

25 A Yes.

1 Q Did the reply from Lane and Skepticon
2 threaten litigation?

3 A Yes.

4 Q If you had to litigate this suit in a
5 state other than Ohio, would that pose a financial
6 burden?

7 A Tremendously.

8 Q A significant financial burden?

9 A Yes.

10 Q As a practical matter, if you were
11 required to litigate this somewhere other than Ohio,
12 would you have to abandon your claim?

13 A I might have to. I'd have to review it at
14 that time.

15 MR. PERRY: I think those are all the
16 questions that I have for you.

17 REDIRECT EXAMINATION

18 BY MR. RANDAZZA:

19 Q Why would you have to abandon your claims
20 if you couldn't litigate them in Ohio?

21 A I wouldn't be able to afford it.

22 Q How do you know that?

23 A Because it's already been extraordinarily
24 expensive. It's very difficult to keep funding
25 this.

1 **Q Which lawyers have you asked for a pricing**
2 **on this in the defendants' home states?**

3 A I haven't yet, but I know what lawyers
4 cost on average.

5 **Q But you have no frame of reference**
6 **factually you are just speculating?**

7 A I'm fairly certain that California lawyers
8 are not going to be cheaper than my lawyer.

9 **Q But the fact is you have no frame of**
10 **reference except for your own guess?**

11 A The frame of reference is the data that I
12 have available, which is what lawyers cost.

13 **Q So you haven't talked to a lawyer and**
14 **asked about contingency?**

15 A I have not.

16 **Q That would not cost you anything unless**
17 **you won?**

18 A Yes. I don't know of anyone that would
19 think of doing that.

20 **Q Why not?**

21 A Why would they?

22 **Q Why do you think no lawyer would take it**
23 **on contingency?**

24 A I have no idea why lawyers would take a
25 case like this because -- well, I haven't asked

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1 them. I don't think it's the kind of thing they do.

2 Q You have no frame of reference?

3 A On that I do not know.

4 Q Isn't most of this case built on that same
5 kind of speculation?

6 A No.

7 Q You are not speculating that someone may
8 have seen something on your Facebook page, for
9 example?

10 A That's not speculation. That's a
11 reasonable argument from facts.

12 Q You have no facts to say that?

13 A Facts to say what?

14 Q You have no direct evidence of anyone
15 having read any of this as far as your move to Ohio?

16 A You mean before --

17 Q You are only extrapolating from -- yes,
18 before the alleged defamation.

19 A You have to ask a more specific question.

20 Q Do you know what the word evidence means?

21 A Yeah.

22 Q You have direct evidence of something.
23 For example, if you had an IP address that hit your
24 blog, you would have direct evidence that somebody
25 at that IP address read your blog?

1 A That's direct evidence.

2 Q If you have what you are calling
3 circumstantial evidence or speculation or a guess
4 based on what you have, that is something different,
5 right?

6 A Indirect evidence is far better than
7 speculation.

8 Q When did you take evidence class in law
9 school?

10 A I'm a philosopher.

11 Q Did you ever see the Mel Brooks movie
12 where the guy says what is your occupation?

13 A No.

14 Q He says I'm a philosopher.

15 MR. RANDAZZA: Have you seen it?

16 MR. PERRY: Yeah, recently.

17 BY MR. RANDAZZA:

18 Q So you're a bullshit artist. Mel Brooks
19 script is not an issue in this case, so we will not
20 introduce that. I'm glad you took that in humor as
21 it was the intent. You ended your affiliation with
22 Camp Quest in 2009; is that true?

23 A In 2009?

24 Q Do you have any affiliation with Camp
25 Quest now?

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1 A I never had any formal affiliation. I
2 don't know what you are quite asking about.

3 Q You said before you never violated a
4 Skepticon policy; is that true?

5 A Yes. I never violated Skepticon policy at
6 Skepticon.

7 Q You never violated the policy or you never
8 violated it at Skepticon?

9 A Their policy only applies at Skepticon.

10 Q It was SSA where you violated policy?

11 A Their fraternization policy, yes.

12 Q You said your blog has over a hundred
13 thousand readers?

14 A Yes.

15 Q Where are you getting that information
16 from?

17 A My statistics in my WordPress Jetpack.

18 Q Is that individual unique hits?

19 A Correct.

20 Q So it's more hits than that. It's a
21 hundred thousand unique IP addresses?

22 A I don't know.

23 Q What is that a hundred thousand? It's a
24 hundred thousand what?

25 A A hundred thousand unique visitors who

1 have read articles on my website per month.

2 Q So that's not counting any repeat visitors
3 or is that factoring in from multiple IP addresses?
4 How are they breaking that down to uniques?

5 A I'm not sure. I have to check the data
6 bank.

7 Q So you don't know how many readers it is?

8 A It has to be within that vicinity.

9 Q Why?

10 A It would be weird if thousands of people
11 were pinning the website multiple times. If you do
12 the math, I'd still have to have 90,000 readers or
13 80,000 readers.

14 Q Can you tell me the equation you are
15 forming in your head to do that math?

16 A No.

17 Q When you say do the math you immediately
18 put me off balance because I'm not a mathematician.

19 A I'm trying to think in my head and it's
20 hard to do figures in my head. For that I'd have to
21 look at how the statistics were being generated.
22 It's usual in the community to talk about how many
23 readers you have based on your unique visitors
24 count.

25 Q Which community?

1 A The Internet. The blogging community in
2 general.

3 **Q So the Earth?**

4 A I guess. Not everybody on the planet is a
5 blogger.

6 **Q But on the Internet?**

7 A Correct.

8 **Q We are talking about the majority of the**
9 **planet.**

10 A I'm talking about the blogging community.
11 When bloggers, websites, corporations talk about
12 what their readership is, they are talking about
13 unique visitors. It's a standard count.

14 **Q You haven't come up with that data, you're**
15 **interpreting something that WordPress gave you?**

16 A Yes, which is standard in the industry.

17 **Q You used to blog at Freethought blogs?**

18 A Yes.

19 **Q Part of the issue is they banned you?**

20 A Yes.

21 **Q Before when you posted there, how much**
22 **editorial control did they exercise over you?**

23 A Not a lot. There were other bloggers that
24 they exhibited editorial control on. They were
25 pretty lax. You had to do something pretty

1 egregious for them to exercise.

2 **Q Tell me the process of posting an article**
3 **there.**

4 A What do you --

5 **Q First you open your computer and you log**
6 **on to Freethoughtblogs.org?**

7 A Yes.

8 **Q You put in your username and password?**

9 A Yes.

10 **Q What happens after you enter your username**
11 **and password?**

12 A I can write an article and hit publish.

13 **Q And then it goes to an editor to approve**
14 **or not approve it?**

15 A No, it goes live and if there's any issues
16 with it Myers or someone at Freethought Blogs brings
17 up the issue on the back channel after the fact and
18 asks for a correction if need be or they take action
19 and ban you, which they have done before.

20 **Q You publish it on your own. It's like**
21 **automated, but then if somebody is mad at you, they**
22 **will yell at you?**

23 A Yeah. They will exercise control if an
24 issue is brought up. I'm certain that if someone
25 defamed someone on Freethought Blogs, Freethought

1 Blogs would shut them down and not support them and
2 got rid of their blog and apologized and so on.

3 MR. RANDAZZA: No further questions.

4 RECROSS-EXAMINATION

5 BY MR. PERRY:

6 Q You just described the editorial control,
7 the protocol when you compose and publish an article
8 on Freethought Blogs. Are you familiar with that
9 same protocol on say the Orbit?

10 A I don't know directly, but I believe it's
11 the same process there.

12 Q Do you think the Orbit exercises any
13 editorial control over their contact providers?

14 A A part of the reason the Orbit was formed
15 was actually so that the people who owned the
16 different blogs would be more involved in that
17 process than was the case at Freethought Blogs.
18 Freethought Blogs had before me already kicked
19 bloggers off for misconduct. Someone published
20 violent threats, so they eliminated him. They
21 eliminated someone for plagiarism. They posted
22 plagiarized text on the blog and they got rid of his
23 blog and issued basically a denunciation, so they
24 didn't affiliate themselves with them anymore. Some
25 of the complaints of other people who joined the

1 Orbit was that they wanted more collective control
2 over things like that. I'm fairly certain that
3 Orbit would have done the same thing if someone was
4 caught plagiarizing there, for instance.

5 **Q What is the managerial hierarchy at Orbit,**
6 **is it a coop?**

7 A It's a coop, yeah.

8 **Q Can you explain that?**

9 A According to them they are a collective
10 that operates democratically.

11 **Q So does that mean there is some senior**
12 **editor that can sensor somebody?**

13 A From the way they described it, it's if
14 they democratically decide to sensor someone they
15 are acting collectively as the editor of the site.

16 MR. PERRY: That's all the questions that
17 I have.

18 REDIRECT EXAMINATION (Continued)

19 BY MR. RANDAZZA:

20 **Q Your statements about the Orbit, so they**
21 **can exercise control after it's published but not**
22 **before?**

23 A As far as I know I don't actually know.

24 **Q That's how it worked at Freethought Blogs?**

25 A That's how it worked at Freethought Blogs.

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1 I don't know how they are running it at Orbit, but
2 from their behavior, I'm assuming it runs the same.

3 MR. RANDAZZA: That's it.

4 MR. PERRY: He will waive.

5 COURT REPORTER: Would you like a
6 transcript?

7 MR. RANDAZZA: E-mail a dirty in advance
8 and an e-tran.

9 COURT REPORTER: Do you want an e-tran?

10 MR. PERRY: Send me a quote.

11 (Thereupon, the deposition was concluded
12 at 2:56 o'clock p.m.)

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1 STATE OF OHIO)

2 COUNTY OF MONTGOMERY) SS: CERTIFICATE

3 I, Wqueana N. George, a Notary Public
4 within and for the State of Ohio, duly commissioned
5 and qualified,

6 DO HEREBY CERTIFY that the above-named DR.
7 RICHARD CARRIER, was by me first duly sworn to
8 testify the truth, the whole truth and nothing but
9 the truth.

10 Said testimony was reduced to writing by
11 me stenographically in the presence of the witness
12 and thereafter reduced to typewriting.

13 I FURTHER CERTIFY that I am not a relative
14 or Attorney of either party, in any manner
15 interested in the event of this action, nor am I, or
16 the court reporting firm with which I am affiliated,
17 under a contract as defined in Civil Rule 28(D).

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1 IN WITNESS WHEREOF, I have hereunto set my
2 hand and seal of office at Dayton, Ohio, on this 6th
3 day of February, 2018.

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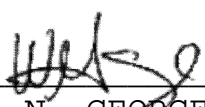
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WQUEANA N. GEORGE
NOTARY PUBLIC, STATE OF OHIO
My commission expires 03-05-2020



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